IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AGERE SYSTEMS, INC., CYTEC INDUSTRIES INC., FORD MOTOR COMPANY, SPS TECHNOLOGIES, LLC and TI GROUP AUTOMOTIVE SYSTEMS L.L.C.,

Civil Action No. 02-CV-3830 (LDD)

Filed 05/23/2008

Plaintiffs.

v.

ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION, et al.,

Defendants.

PLAINTIFFS' OBJECTIONS TO **DEFENDANTS' TRIAL EXHIBITS**

This Court's May 13, 2008 Order set a deadline of May 23, 2008 for filing pretrial motions "regarding all significant evidentiary or other issues anticipated to arise during trial (including issues pertaining to the admissibility of particular witness testimony or particular exhibits)." Fed. Civ. P. 26(a)(3)(B) requires the filing of a list of objections to use by another party of a deposition under Rule 32(a) and to the admissibility of materials listed in another party's pretrial disclosures with 14 days after those disclosures are made. Fed. Civ. P. 26(a)(3)(B). This Court's Local Rules provide that authenticity of exhibits will be deemed established unless written objection is filed at least five days before trial. Local Rule 16.1(d)(1)(a).

Defendants have listed a few thousand documents on their various exhibit lists. Plaintiffs have not been given an opportunity to review each of the Defendants' exhibits. Also, in many cases, the Defendants did not identify their exhibits by Bates-number. Consequently, Plaintiffs are not able to identify all of the documents on the Defendants' exhibit lists. Further, Plaintiffs have no way of knowing the purpose for which Defendants intend to use the various

exhibits contained on their respective lists and what evidentiary foundation the Defendants intend to offer for their exhibits. Accordingly, in order to eliminate any concerns that Plaintiffs' objections to the Defendants' exhibits may be waived, Plaintiffs are compelled to now object to certain of the Defendants' exhibits. Plaintiffs may be willing to withdraw these objections after learning the purpose that a particular document is being offered by Defendants and the evidentiary foundation for that particular document. Plaintiffs object to each of the documents listed on Defendants' respective exhibit lists on the basis that the documents are hearsay except for the following:

Ashland Chemical Company

- 8. CH2MHill, 1997. Final Remedial Investigation Report prepared for USEPA under Contract No.68-W-0090. January 31, 1997.
- 9. NTJS Corporation, 1986. Site Inspection of Boarhead Farms Prepared Under TDD No. F3-8403-25, EPA No. PA-257, Contract No. 68-01-6699 for the Hazardous Site Control Division, U.S. Environmental Protection Agency, January 20, 1986. AR100173-256.
- 12. USEPA, 1998a. Proposed Plan: Boarhead Farms Site, Bridgeton Township Bucks County, PA. January 1998.
- 13. USEPA, 1998b. Record of Decision: Boarhead Farms EPA ID: PAD047726161, OUI, Bridgeton Township, PA. November 18, 1998.
- 17. Brown and Caldwell. 2004a. Remedial Construction Report, Operable Unit No. 2, Boarhead Farms Superfund Site. May.
- 21. CH2M HILL. 1997a. Boarhead Farms Remedial Investigation Report.. January.
- 22. CH2M HILL. 1997b. Boarhead Farms Feasibility Study Report. July.
- 25. EPA. 1993. Federal On-Scene Coordinator's Report for Boarhead Farms NPL Site. June 18, 1992 to September 17, 1993.
- 30. EPA. 1998a. Superfund Program Proposed Plan, Boarhead Farms site. January.
- 31. EPA. 2004a. Remedial Construction Report, Operable Unit No.2, Boarhead Farms

- Superfund Site. May.
- 44. Noll, P. and B. Passmore. 1973. Inspection of Boarhead Corp. on 2-14-73.
- 45. NUS Corporation. 1985: Preliminary Assessment of Boarhead Farms. August.
- 46. NUS Corporation. 1986. Site Inspection of Boarhead Farms. January.
- 57. EPA Approval of Removal Action for the Boarhead Farms NPL Site March 18, 1996 (AR400240-400254).
- 66. Waste Discharge Inspection Report dated 2/14/73 and notes of Peter Noll and B. Passmore
 - [excluding notes of Peter Noll and B. Passmore]
- 68. Waste Discharge Inspection Report; Water or Waste Quality Reports; Memorandum from A. Wills to C.T. Beechwood dated 3/7/73.
- 69. PADER memo dated 3/12/73; handwritten note dated 3/12/73; photographs [excluding handwritten note dated 3/12/73, photographs]
- 83. 7/16/75 - Waste Discharge Inspection Report; (BCDH Field Action Report).
- 84. 4/1/76 - Waste Discharge Inspection Report.
- 113. Boarhead Corporation Certificate of Incorporation dated September 2, 1969 [P-5].
- 114. Deed between Robert and Ruth Buckman and Boarhead Corporation dated October 16, 1969 [P-6].
- 115. DeRewal Chemical Company, Inc. Certificate of Incorporation dated December 29, 1969 [P-7].
- 116. Bench opinion filed May 17, 1978 in United States v. Manfred DeRewal, et al., in the United States District Court for the Eastern District of Pennsylvania at Docket No. 77-287.
- Environmental Chemical Control, Inc. Certificate of Incorporation dated October 17, 117. 1976 [P-27].
- 118. Cytec August 15, 1994 Response to EPA (CYTC000777-783).
- 119. Cytec, 1994. Response to USEPA March 11, 1994 correspondence. April 28, 1994.

- 120. American Cyanamid Company, 1988. Response to USEPA June 10, 1988 correspondence. July 13, 1988.
- 122. American Cyanamid Company, 1993. Response to USEPA May 26, 1993 correspondence. Includes attachments. July 2, 1993.
- 129. Jonas February 18, 1975 Landfill Sites - Coding (marked as Exhibit Jonas - 14, 6/21/95).
- 130. Jonas handwritten ledger of waste disposal for 1974 (marked as Exhibit 2/18/75 in Kramer Federal litigation).
- 131. Jonas February 18, 1975 Landfill Sites - Coding (marked as Exhibit Jonas - 14, 6/21/95).
- 132. Jonas, 1972. Application for Certification to Collect or Haul Solid Waste (Exhibit Jonas 20, 6/22/95).
- 133. Jonas tariff for solid waste collection 4/19/72 (marked as Exhibit Jonas-9, 6/20/95).
- 134. Jonas June 6, 1972 Application for Certification to collect or haul solid waste (marked as Exhibit Jonas 20).
- 135. Jonas 1974 N.J. Department Registration Statement for a solid/liquid waste collection or hauler (marked as Exhibit Jonas - 15, 6/21/95; different version marked as Exhibit Jonas -16, 6/21/95)
- 136. Jonas, Inc. 1975. Correspondence to NJDEP re coding of materials, landfills and recycling plants. February 18, 1975 (labeled as Exhibit Jonas 14, 6/21/1995).
- 137. Jonas 1975 Registration statement for solid/liquid waste collect or haul (marked as Exhibit Jonas - 12 (6/21/95); another version marked as Jonas - 13 (6/21/95).
- 138. Jonas 3-ring binder ledger pages, 1976-1979, Bates #00000020-00000050.
- 145. December 15, 1977 letter from Sidney Frankel to Jonas with list of wastes (marked as Exhibit Bailey 4 and Frankel 5 and Frankel 4 (2005 dep.)).
- 148. Documents marked as Jonas 3-Ring Binder Pages used by EPA with notation "American Cyanamid".
- 157. Jonas 2978 NJDEP Registration Statement (marked as Exhibit Jonas - 11, 6/21/95).
- 181. Series of National Rolling Mills bills of lading, from 1975 (no Bates #)
- 184. Ford Motor Company, 1992. Response to USEPA's September 30, 1992 request for information, FORD000014-21.

- 185. USEPA, 1992. Information Request Letter to Ford Motor Company, re Boarhead Farms Site. September 30, 1992. With enclosures. FORD000001-13.
- 187. USEPA, 1994b. Information request letter to Ford Motor Company, re Boarhead Farms Site. April 12, 1994. With enclosures. FORD000022-135.
- 188. Ford Motor Company, 1994. Response to USEPA April 12, 1994 request for information. June 14, 1994. Attachments. BSAI000137-493.
- 189. USEPA, 1995. Information request letter to Ford Motor Company, re Boarhead Farms Site. November 28, 1995. FORD000495-516.
- 190. Ford Motor Company, 1996. Response to USEPA November 28, 1995 Information Request. January 31, 1996. FORD000518-524.
- 196. 3/27/72 -DeRewal invoice 395 (BSAI006103).
- 197. 7/14/72 DeRewal invoice 448 (BSAI006155).
- 198. 8/17/72 DeRewal invoice 469 (BSAI006105).
- 199. 2/12/73 Philco Ford Purchase Order 24298 (BSAI 006106).
- 200. Philco Ford Purchase Order 24441 (BSAI 006254).
- 201. 4/12/73 Philco Ford Invoice No. 72343.
- 202. 4/24/73 Philco Ford Invoice No. 72405 (BSAI006166).
- 203. 5/1/73 Philco Ford Invoice No. 72570 (BSAI 006264).
- 204. 10/31/73 (DeRewal Invoice No. 746 (BSAI006260).
- 224. Stock sale agreement. (BSAI 03003-030094)
- 228. SPS Technologies, 1988. Response to USEPA June 10, 1988 letter request. June 23, 1988. SPST00001-SPST00088.
- 229. SPS Technologies, 1992. Response to USEPA September 30, 1992 letter request. November 3, 1992. SPST00089-SPST00176.
- 230. SPS Technologies, 1996. Response to USEPA November 5, 1995 letter request. February 5, 1996. SPST00177 SPST00396.
- 233. USEPA, 1992. Letter to Standard Pressed Steel Technologies, with attachments. September 30, 1992. BSAI035101 BSAI035108.

236. AT&T, 1988. Correspondence to Ms. Suzanne Billings, USEPA, re Boarhead Farms Site. June 23, 1988. (AGER000001-000005).

Document 339

- 241. Santarelli 3 - Lucent Technologies, May 9, 1997, Correspondence to USEPA. AGER000060-000068.
 - [letter to EPA only; not including attachments to response]
- 243. Santarelli 5 - Lucent Technologies, May 29, 1997, Correspondence to USEPA, AGER000069-0000118.
 - [letter to EPA only; not including attachments to response]
- 244. Santarelli 6 - AT&T, February 1, 1996 Correspondence to USEPA and USEPA, November 8, 1995, Correspondence to AT&T c/o Western Electric (Greensboro, NC), AGER000006-000039
 - [letter to EPA only; not including attachments to response]
- 247. Agere CERCLA 104(e) response to June 10, 1988 request (AGER000001-000005) [letter to EPA only; not including attachments to response]
- 248. Agere CERCLA 104(e) response to November 8, 1995 request (AGER000006-000039). [letter to EPA only; not including attachments to response]
- 249. Agere CERCLA 104(e) response to March 19, 1997 request (AGER000040-000120). [letter to EPA only; not including attachments to response]
- Boarhead Farms Settlement Agreement by and between Certain Plaintiff Settling Parties and Agere Systems Inc. (BSAI102980-102993).
- 252. "Agreement in Principle" (PHKS073639-073640).
- 253. Boarhead Farm Site PRP Group Organization Agreement (PHKS071667-071680) also BSAI075568-75587
- Environmental Remediation Trust Agreement for Operable Unit 1 PHKS 070841-254. 070865. (PHKS 061072-061077).
- 255. signature pages for Cytec (PHKS 071624) which is attached to a Cytec letter dated January 15, 2002 (PHKS 071622), Agere (PHKS 071638-071639), Ford (PHKS 071640) and SPS (PHKS 071642-071643).

- 256. Agreement with Bigler Associates, Inc. ("Contractor") (PHKS 071575-071588) (PHKS071589-071593).
- 258. Letter from Agere dated May 31, 2001
- 259. Letter from John Judge dated May 31, 2001
- 260. Separation and Distribution Agreement by and between Lucent Technologies, Inc. and Agere Systems, Inc., dated 2/1/01
- 261. OU-1 Consent Decree
- 262. OU-2 Consent Decree
- 263. Revision to Notice of Lodging of Consent Decree Under CERCLA Published on January 8, 2002, U.S. Department of Justice, Wednesday, January 23, 2002, 667 **FR** 3233).
- 264. November, 2000 updated cost report for BF Site. (BSAI 082007-082318).
- 265. EPA collection invoice 1/16/01 (PHKS 070912-070962)
- 266. EPA bill for collection 12/7/03 (PHKS 072550-72584)
- 268. EPA bill for collection dated July 2, 2002 (PHKS 070497-070523)
- 269. EPA bill for collection dated January 27, 2003 (PHKS 072791-072815)
- 270. EPA collection invoice dated 5/13/02 (PHKS 072818-072821)
- 278. EPA letter dated August 5, 2004 to Montgomery McCracken Walker & Rhoads with revised bill for collection (PHKS 061450-1455).
- 280. USEPA Proposed Plan for the Site, 1/98
- 281. Letter from Glenn Harris to "Boarhead Defendants", 7/12/07 (BSAI082007-BSAI0823)
- 292. EPA Interim & Funding Cost Invoices (BSAI052940-053007)
- 294. Preliminary O&M Plan Groundwater Extraction & Treatment System 90% Design Submitted, prepared by Bigler Associates for PRP Group Boarhead Farms Superfund Site, dated 12/01.
- 301. Emhart Correspondence to USEPA, 1988. BSAI 001860-5

[letter to EPA only; not including attachments to response]

- 302. Ciba-Geigy Shipping Records, 1976-1977 (BSAI026638-745, BSAI004078-253).
- 304. Ciba-Geigy, 1988. Response letter to USEPA June 10, 1988 request for information. July 25, 1988. BSAI004015-20.
 - *[letter to EPA only; not including attachments to response]*
- 305. Ciba Specialty Chemicals Corporation, 1997. Response to USEPA March 19, 1997. letter. March 24, 1997. BSAI 026746.
 - [letter to EPA only; not including attachments to response]
- 308. Ciba-Geigy April 21, 1997 Response to the EPA
 - [letter to EPA only; not including attachments to response]
- 309. Ciba-Geigy March 8, 1999 Response to the EPA [letter to EPA only; not including attachments to response]
- 310. Ciba-Geigy March 24, 1999 Response to the EPA [letter to EPA only; not including attachments to response]
- 311. Ellwood Ivins Tube Co., 1971. Department of the Army, Corps of Engineers, Application for Permit to Discharge or Work in Navigable Waters and Their Tributaries. June 10, 1971. BSAI032686-692.
- 312. Hawk, Hugh, 1977. Correspondence to PADER re: Hazardous Waste. May 24, 1977. BASI005209.
- 313. Plymouth Tube Co., 1988. Correspondences to USEPA re Boarhead Farms Site. June 22, 1988, October 25, 1988. (BSAI000361, BSAI000358).
 - [letter to EPA only; not including attachments to response]
- 316. DeRewal Chemical Company, 1973. Copy of correspondence to F. Marchewka of Quickline Design, Inc. March 2, 1973. BSAI016524.
- McAndrew, Patrick F. 1996. Letter to L. Miller of USEPA, re Boarhead Farms Site. 317. February 1, 1996
 - [letter to EPA only; not including attachments to response]
- 318. Schmidt, Sanford F. 2003. Letter to Glenn Harris re Quickline Design & Mfg. May 16,

2003.

- 327. Drum Photo #0012.
- 328. Code Documents (PHKS 065008-065011).
- 329. Chain of Custody Record for sample number BF2-WC-MA:22:DM:RHAA designated as BF-22 (BSAI 058448).
- 332. Rohm and Haas' Glacial Acrylic Acid Monomer (photo nos. 0035, 0035A and 0035B)
- 336. Jonas ledger page entitled "Simon Wrecking Co. Williamsport", undated, no Bates #, including with materials labeled from a file "Boarhead Farms Superfund Site, 011938.074694, Jonas 3-Ring Binder Pages Used by EPA, Redwell #24."
- Morgan, Sharon Oras, 2003. Correspondence to Glenn Harris, re Boarhead Farms Group 337. v. Simon Wrecking Co., Inc. et al. March 20, 2003.
- 341. Unisys, 1992. Correspondence to USEPA, Re: Boarhead Farms Site, November 12, 1992. PHKS027487-92.
 - [letter to EPA only; not including attachments to response]
- 342. Unisys, 1988. Correspondence to USEPA, Re: Boarhead Farms Site. July 19, 1988. BSAI0001847-52.
 - [letter to EPA only; not including attachments to response]
- 344. Section 104(e) Response of Rahns Specialty Metals, Inc. (RAHN0001-RAHN0015) [letter to EPA only; not including attachments to response]
- 346. DeRewal Invoice to Techalloy dated 8/10/72 for removal of twenty drums of waste oil (Boarhead Exhibit P-37) (BSAI 032975).
- 347. Techalloy letter to Pennsylvania Department of Environmental Resources dated 10/12/72 (RAHN 0013).
- DeRewal Chemical Company letter to Carpenter Technology Corporation dated 348. November 27, 1972 (Boarhead Exhibit P-32) (BSAI025184).
- 349. DeRewal Chemical Company timecard for Bruce DeRewal dated 9/21/73.
- 350. DeRewal Chemical Company timecard for "Walt" undated (RAHN 0016).
- 351. Techalloy Purchase Order No. R3453 dated 11/28/73 (RAHN 0014).

- 352. Answers to Plaintiff's Interrogatories Addressed to Techalloy, Inc. in Borough of Collegeville, et al. v. Superior Two Company, et al., Montgomery County CCP, No. 81-7042 (RAHN0245-0268) (Marked as Exhibit Stufflet-1, 12/22/04).
- 353. August 1972 DCC invoice to Techalloy (P-37).
- 354. July 14, 1972 DCC quotation letter to Techalloy.
- 355. October 12, 1972 Techalloy letter to PADER (RAHN 0288).
- 356. 11/26/73 Techalloy purchase order to Liquid Removal Service.
- 357. DCC timecard for Bruce DeRewal dated 9/21/73.
- 358. DCC timecards for "Walt" dated 11/26 and 11/27/73.
- 359. 5/16/73 PADER Waste Discharge Inspection Report of Techalloy (RAI-1N-521).
- 360. 10/17/73 PADER Regional Engineer's Review of Techalloy (RAHN-0592-93)
- 361. 6/5/72 Waste Inspection Report of Techalloy.
- 362. August 20, 1971 PADER Waste Discharge Inspection Report of Techalloy (RAHN-0622).
- 363. Techalloy 104(e) response to EPA [letter to EPA only; not including attachments to response]
- 364. February 1973 portions of Techalloy accounts payable register (Senin-2).
- 365. Sanitary Sewerage System, Drawing No. S-10 (Moran-1).
- 366. Application for Plumbing Permit to Connect Building to Public Sewer (Moran-2 and RAHN 1251-59).
- 367. Portions of Weston Technical Report (RAHN-0539 - RAHN 0555).
- 377. 11/6/87 letter from Stollsteimer to EPA
 - [letter to EPA only; not including attachments to response]
- 378. 10/2/87 letter from Bach to EPA [letter to EPA only; not including attachments to response]
- 379. 9/11/87 letter from Bach to EPA

Iletter to EPA o	only; not including a	attachments to res	roonse l
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- 382. 1/10/72 letter from DeRewal
- 383. 9/22/00 letter from Barbin to EPA [letter to EPA only; not including attachments to response]
- 387. Flexible Circuits' 1969 Annual Report
- 393. 6/12/73 contract (Cheri-2) and legal department cover letter (Cheri-1)
- 394. 12/20/73 purchase order (Cheri-3)
- 395. "Waste Acid Removal Cost" chart (Cheri-8)
- 396. "DeRewal Chemical Co. Waste Acid Removal" chart (Cheri-7)
- 397. "DeRewal Chemical Co. 80#228" chart (Cheri-6)
- 398. 10/8/74 Memo (Mann-4)
- 399. 2/25/71 letter (Mann-15)
- 400. Analysis Requests (Mann-3)
- 401. Handwritten Notes (Mann-12)
- 402. 7/17/69 Memo (Mann-8)
- 403. 7/8/69 Handwritten telephone note (Adams-2)
- 404. 2/25/70 Memo (Mann-14)
- 405. Polinko Affidavit
- 6/12/73 Agreement between DeRewal Chemical Co., Inc. and Carpenter Technology 411. (Cheri-2) and legal department cover letter dated 6/5/73 forwarding proposed Agreement (Cheri-1)
- 412. 12/20/73 purchase order (Cheri-3)
- "Waste Acid Removal Cost" chart (Cheri-8) 413.
- "DeRewal Chemical Co. Waste Acid Removal" chart (Cheri-7) 414.

- 415. "DeRewal Chemical Co. 80#228" ledger sheet (Cheri-6)
- 416. 10/8/74 Memo regarding waste acid disposal costs (Mann-4)
- 417. 2/25/71 letter from David Mann to Ernest Roth regarding CarTech waste acids (Mann-15)
- 418. Analysis Requests (Mann-3)
- 419. Handwritten Notes (Mann-12)
- 420. 7/17/69 Memo regarding evaluation of Revere Chemical Corporation (Mann-8)
- 421. 7/8/69 Handwritten Telephone Note (Adams-2)
- 422. 2/25/70 Memo confirming Revere Chemical no longer removing CarTech's waste hydrochloric acid (Mann-14)
- 423. Polinko Affidavit dated 10/12/06
- 427. Accounts receivable ledger for 1974-75
- 431. May 1986 application for discharge permit
- 447. Letter Agreement, dated January 7, 1977, between R.W. Landmesser of Advanced Environmental Technology Corp. and Don Hollwedel of Diaz Chemical Corporation extending services (Landmesser-4).
- 448. Correspondence from H.D. Hollwedel of Diaz Chemical Corporation to Robert Landmesser of Advanced Environmental Technology Corp., dated April 14, 1977, confirming Diaz Chemical Corporation as primary source for disposal of its waste nitration acid (Landmesser-5).
- 449. Invoice, dated March 7, 2977, from Advanced Environmental Technology Corp. to Diaz Chemical Corporation (Landmesser-6).
- 450. USEPA's Information Request to Diaz Chemical Corporation (BSAI02928 I BSAI9029290; BSAI029291 BSAI029293).
- 451. Diaz Chemical Corporation's Response to Information Request of USEPA (BSAI029140-BSAI029277; BSAI029278-BSAI029280).
- 452. Purchase Order dated 5/16/77 (BSAI029294-BSAI029295).
- 453. Acknowledgment of bill of lading dated 5/28/77 (Luezarder-12).

- 456. Letter Agreement, dated January 7, 1977, between R.W. Landmesser of Advanced Environmental Technology Corp. and Don Hollwedel of Diaz Chemical Corporation extending services (Landmesser-4).
- 457. Correspondence from H.D. Hollwedel of Diaz Chemical Corporation to Robert Landmesser of Advanced Environmental Technology Corp. dated April 14, 1977, confirming Diaz Chemical Corporation as primary source for disposal of its waste nitration acid (Landmesser-5).
- 458. Invoice, dated March 7, 1977, from Advanced Environmental Technology Corp. to Diaz Chemical Corporation (Landmesser-6).
- 459. USEPA's Information Request to Diaz Chemical Corporation (BSAI029281 -BSAI029290; BSAI029291 - BSAI029293).
- 460. Diaz Chemical Corporation's Response to Information Request of USEPA (BSAI209140-BSAI029277; BSAI029278-BSAI029280).
- 461. Purchase Order dated 5/16/77 (BSAI029294-BSAI029295).
- 462. Acknowledgment of bill of lading dated 5/28/77 (Leuzarder-12).
- 465. Portion of document indicating the amount of money and waste streams that were sent to DCC from Ashland Chemical and Diaz (AETC197-199).
- 469. 1/7/93 letter from Curran to EPA.
- 470. September 1992 Site Investigation.
- 10/29/92 letter from Rosato to EPA. 471.
- 472. February 1973 DCC invoice.
- 473. Handy & Harman interrogatory responses.
- 477. Correspondence from J. Leuzarder to A. Curley, 8/3/76 (ASHL00002-ASHL00003).

- 478. Correspondence from R.T. Olsen to A. Barnhouse, 8/4/76 (ASHL00004).
- 479. Bills of Lading, 8/9/76-8/20/76 (ASHL00005-ASHL00010).
- 483. Bills of Lading, 8/23/76-8/32/76 (ASHL00037-ASHL00044).
- 485. Bills of Lading, 9/1/76-9/18/76 (ASHL00070-ASHL00072).

- 486. Memo Re: Waste Chemical Disposal, 9/16/76 (ASHL00066-ASHL00069)
- 487. Bills of Lading, 9/17/76-9/18/76 (ASHL00070-ASHL00072)
- 488. Memo Re: Visit with Current Spent Acid Disposer, 9/20/76 (ASHL00073-ASHL00074).
- 489. Bills of Lading, 9/21/76-9/2 /76 (ASHL00075-ASHL00084).
- 491. Bills of Lading, 10/1/76-10/13/76 (ASHL00087-ASHL00099)
- 493. Bills of Lading, 10/14/76-10/19/76 (ASHL00105-ASHL00110)
- 494. Memo Re: Visit to Disposal Site, 10/19/76 (ASHL00111-ASHL00112)
- 495. Bills of Lading, 10/20/76-10/29/76 9(ASHL00113-ASHL00121).
- 497. Bills of Lading, 11/4/76-12/16/76 (ASHL00123-ASHL00139).
- 500. Bills of Lading, 1/29/77-2/10/77 (ASHL00142-ASHL00157).
- 502. Bills of Lading, 2/11/72-2/ /77 (ASHL00163-ASHL00188).
- 504. Bills of Lading, 3/1/77-3/2/77 (ASHL00192-ASHL00195).
- 506. Bills of Lading, 3/3/77-3/18/77 (ASHL00197-ASHL00212).
- 507. DeRewal Invoice, 3/19/77 (ASHL00213-ASHL00214).
- 508. Bill of Lading, 3/1 /77 (ASHL00215).
- 509. DeRewal Invoice, 3/19/77 (ASHL00216).
- 510. Bills of Lading, 3/19/77-3/31/03 (ASHL00217-ASHL00234).
- 512. Bills of Lading, 4/2/77 (ASHL00238-ASHL00239).
- 514. Bills of Lading, 4/5/77 (ASHL00246-ASHL00248).
- 515. DeRewal Invoice, 4/9/77 (ASHL00249-ASHL00250).
- 516. Bills of Lading, 4/12/77 (ASHL00251-ASHL00252).
- 517. Memo Re: CDN Spent Acid Disposal, 4/14/77 (ASHL00253-ASHL00254).
- 518. Bill of Lading, 4/15/77 (ASHL00255).

- 520. Correspondence dated September 7, 1976 from Leuzarder to DeRewal (Leuzarder-11).
- 521. Correspondence from Susan Lemore to Manfred DeRewal, dated August 23,1 976. confirming conversation regarding required certificate of insurance to be issued to Advanced Environmental Technology Corp. for work to be performed at Ashland Chemical (Leuzarder-13).
- 522. Handwritten notes (undated) referring to sulfuric acid leak at Boarhead Farms (Landmesser-3).
- 523. USEPA's Information Requests to Advanced Environmental Technology Corp. and Advanced Environmental Technology Corporation's Response to Information Requests of USEPA (BSAI022885-022936 and BSAI 022975022997)
- 526. Photo 0008 - Ashland Chemical Label - June 18, 2003
- 528. Photo0008A, 6/18/03 (subsequently received)
- 532. Photo 0044 - Ashland Chemical Label and Contents - September 2, 2003
- 546. Guilty Plea and Colloquy (6/19/78) (U.S.E.D. PA)

Handy & Harman Tube Company, Inc.

HH-5	Agere Systems, et al., 2005. Fourth Amended Complaint. 1 August 2005.
HH-8	American Cyanamid, 1993. American Cyanamid's response to EPA's 1993
1111-0	request for information. July 2, 1993. (BSAI 001625 - BSAI 001739)
HH-9	American Cyanamid, 1993. American Cyanamid's response to EPA's 1993
1111-9	request for information. July 2, 1993. (BSAI 001625 - BSAI 001739)
	American Cyanamid, 1994. American Cyanamid's supplemental response to
HH-10	EPA's request for information (1993 response inadequate). April [sic]1994.
	(BSAI 007751 - BSAI 007985)
	Ashland, 1976a. Straight Bill of Lading; shipped to: Advanced Envirotech
HH-12	Company (P-51). Ashland Chemical Company. 16 Sept, 1976. (BSAI
	022973)
	Ashland, 1976b. Straight Bill of Lading Shipped to Advanced Environtech
HH-13	Company (P-63). Ashland Chemical Company. Various dates in 1976-1977.
1111-13	(ASHL00005-00010; 00037-00044; 00048-00072, 00075-00084, 00090-
	00305)
HH-14	Ashland, 1976c. Straight Bill of Lading. Various dates. Ashland Chemical
1111-14	Company
	AT&T, 1988. AT&T's 104(e) response, including invoices and exhibits. June
HH-17	23, 1988. (BSAI000103-BS000106)
nn-1/	
	[letter to EPA only; not including attachments to response]
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AT&T, 2005 (a). Santarelli 6 (Letters from AT&T to EPA, exhibit from Santarelli deposition). February 22, 2005. (AGER00006-AGER000039)
[letter to EPA only; not including attachments to response]
Bostik, 1978. 104(e) response from Bostik South, Inc. June 23, 1978
[letter to EPA only; not including attachments to response]
Brown & Caldwell, 2001. Boarhead Farms Superfund Site Figure 1-2 Site
Map, March 2001. (BSAI9351).
Brown & Caldwell, 2002a. Boarhead Farms Superfund Site Upper
BlackEddy, Bucks Co. PA Operable Unit No. 2 Remedial Design Work Plan.
March 2002. (BSAI 9075-9350)
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HH-212	American Cyanamid Company, 1988. Response to USEPA June 10, 1988
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HH-215	Cytec, 1994. Response to USEPA March 11, 1994 correspondence. Includes
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HH-219	Jonas, 1972. Application for Certification to Collect or Haul Solid Waste
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HH-220	Jonas, 1974. Registration Statement for a Solid/Liquid Waste Collector or
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HH-221	Jonas, 1975. Registration Statement for a Solid/Liquid Waste Collector or
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HH-222	Jonas, Inc. 1975. Correspondence to NJDEP re coding of materials, landfills
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HH-223	Jonas 3-ring binder ledger pages, 1976-1979, Bates #00000020-00000050.
HH-231	Jonas ledger page entitled "National Rolling Mills, Paoli PA", 1976, no Bates
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HH-234	Series of National Rolling Mills bills of lading, from 1975 (no Bates #s).
HH-236	Ford Motor Company, 1992. Response to USEPA's September 30, 1992
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НН-256	Santarelli 5 - Lucent Technologies, May 29, 1997, Correspondence to USEPA, AGER000069-0000118.
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НН-257	Santarelli 6 - AT&T, February 1, 1996 Correspondence to USEPA and USEPA, November 8, 1995, Correspondence to AT&T c/o Western Electric (Greensboro, NC), AGER000006 - 000039;
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НН-267	CH2MHill, 1997. Final Remedial Investigation Report, Volume I, prepared for USEPA under Contract No. 68-W-0090. January 31, 1997.
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HH-286	Ciba Specialty Chemicals Corporation, 1997. Response to USEPA March 19,
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HH-290	Hawk, Hugh 1977. Correspondence to PADER re: Hazardous Waste. May 24,
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HH-291	Plymouth Tube Co., 1988. Correspondences to USEPA re Boarhead Farms
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ПП-294	DeRewal Chemical Company, 1973, Copy of correspondence to F. Marchewka of Quickline Design, Inc. March 2, 1973. BSAI016524.
HH-297	Jonas ledger page entitled "Simon Wrecking Co. Williamsport", undated, no
1111-277	Bates #, included with materials labeled from a file "Boarhead Farms
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HH-308	[letter to EPA only; not including attachments to response] P-5: Common wealth of Pennsylvania, Certificate of Incorporation, Boarhead
1111-300	Corporation. September 2, 1969. BSAI047227-9.
HH-309	P-6: Indenture between Alan R. Reim, Gail D. Reim, Robert W. Buckman,
	Ruth J. Buckman and Boarhead Corporation, for sale of land in Bridgeton
	Township, Bucks County PA to Boarhead Corporation, October 16, 1969.
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HH-310	P-7: Commonwealth of Pennsylvania, Certificate of Incorporation, DeRewal
	Chemical Company, Inc., December 29, 1969. BSAI047244.
HH-311	P-20: Lease Agreement between Philadelphia Hide Corporation and Manfred
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HH-313	P-22: Pennsylvania Department of environmental Resources Waste Discharge
1111-515	Inspection report, Boarhead Corporation, Lonely Cottage Road, Bucks
1777 014	County, Bridgeton Twp., February 14, 1973.
HH-314	P-23: Pennsylvania Department of Environmental Resources Waste Discharge
	Inspection Report, Boarhead Corporation, March 5, 1973 inspection.
HH-315	P-24: Agreement between Pennsylvania Department of Environmental
-	Resources and Boarhead Corporation, March 21, 1973. BSAI017233-4.
HH-316	P-25: City of Philadelphia Water Dept. correspondence to Manfred DeRewal,
	September 24, 1974. PHKS003282-4.
HH-317	P-26: City of Philadelphia correspondence to Manfred DeRewal, June 2, 1975.
HH-318	P-27: Environmental Chemical Control certificate of incorporation, October
	18, 1976. BSAI047236.
HH-319	P-28: City of Philadelphia Dept. of Licenses and Inspections Violation Notice
	issued to Ed Meliti & Linda Cochran regarding 5001 Comly Street (Bldg R),
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HH-320	P-29: City of Philadelphia v. Wissinoming Industrial Park et al. Agreement,
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HH-321	Complaint filed June 18, 2002
HH-322	Amended Complaint filed August 26, 2002
HH-323	Second Amended Complaint filed February 21, 2003
HH-324	Third Amended Complaint filed September 19, 2003
HH-325	Fourth Amended Complaint filed August 1, 2005
HH-337	Brown and Caldwell Revised Supplemental Design Investigation Report
	(October 2002)

Carpenter Technology Corporation

- CH2M Hill Boarhead Farms Remedial Investigation Report prepared for U.S. 1. Environmental Protection Agency. January 1997.
- CH2M Hill Boarhead Farms Site Upper Black Eddy, PA Feasibility Study Report prepared for U.S. Environmental Protection Agency. July 1997.
- EPA Superfund Program Proposed Plan. January 1998. 3.
- EPA Superfund Program Record of Decision. Boarhead Farms Superfund Site. 4. November 1998.
- 5. EPA Five-Year Report dated August 22, 2007.
- 6. Letter dated 1/21/00 from Carpenter to EPA.
- 7. Letter dated 2/14/96 from Carpenter to EPA.
- 8. Letter dated 4/28/86 from Carpenter to EPA.

- 9. Letter dated 7/12/88 from Carpenter to EPA.
- 10. Letter dated 11/14/72 from DeRewal to Carpenter.
- 12. Letter dated 11/27/72 from DeRewal to Carpenter.
- 13. Letter dated 6/5/73 from Carpenter to DeRewal.
- 14. Agreement dated 6/12/73 between Carpenter and DeRewal.
- 15. Waster Acid Removal Chart for period July 1972 - June 1973.
- 16. Undated handwritten note from Dick Cheri re: Waster Acid Haulers.
- 17. Carpenter Purchase Order to remove pickling liquor for 1974.
- 18. Carpenter Purchase Order to remove pickling liquor for 1973.
- 19. Carpenter chart of DeRewal removal for period 1/20/74-5/30/74.
- 20. Handwritten notes of July 1973-June 1974 Waste Acid Removal
- 21. Carpenter Chart of DeRewal Waste Acid Removal for period 6/13/73-5/ /7.
- 22. Carpenter Memorandum, "Waste Acid Disposal Costs" dated 10/8/74.
- 23. Carpenter Chart of Waste Acid Removal Cost for 1973-1974.
- 27. Affidavit of Charles Polinko and documents attached thereto.

NRM Investiment Company

- (1) Worthington Steel Company's responses to EPA's 104(e) request in this matter and in G.R.O.W.S., exclusive of laboratory reports.
- (3) Group Agreement for OU-1
- (7) EPA's RI/FS of 1997 and its exhibits including the Baseline Risk Assessment
- (8) EPA's ROD of 1998 and its exhibit
- (11) Jonas Inc. 1978 fiscal year report to NJDEP (Exhibit 9 to Hochreiter deposition).

AETC

Ca	IS	2:02-	cv-038	30-LD	p D o	cume	nt 339	Filed	05/23/2	2008 F	age 2	3 of 65
	Recip			1	A.T. Curley	Manfred DeRewal DeRewal Chemical Co.	DeRewal.M DeRewal Chemical	Mandred DeRewal DeRewal Chemical Company	Manfred DeRewal	AETC	A.T. Curley	Advanced Environmental Technology Corp.
	Author				W.R. Starkey	Advanced Environmental Technology Corp.	Leuzarder, J Advanced Environmental Technology Corp Inc	John Leuzarder Advanced Environmental Technology Corp	John Leuzarder	Ashland	File	DeRewal Chemical Co.
	Summary	Deposition Exhibit P-21	Deposition Exhibit Landmesser 3	Deposition Exhibit Leuzarder 7	update on status of waste disposal	Letter requesting certificate of insurance	Letter	Letter confirming disposal for Chroma- Tube	letter confirming waste removal prices	spend mixed acid	visit with current spent acid disposer	invoice regarding waste removal
	Docdate	Exhibit	Exhibit	Exhibit	Memorandum	Letter	Letter	letter	Letter	Bill of Lading	Memorandum	Invoice
	Docdate	0000/00/00	0000/00/00	0000/00/00	8/23/76	8/23/76	8/31/1976	8/31/76	9/61/6/6	9/15/1976	9/20/1976	3/19/1977
	Witness	Advanced Environmental Technology Corp.	Advanced Environmental Technology Corp.	Advanced Environmental Technology Corp.	Advanced Environmental Technology Corp	Advanced Environmental Technology Corp	Advanced Environmental Technology Corp.	Advanced Environmental Technology Corp.	Advanced Environmental Technology Corp.			
	Batesrng	AETC13- AETC-15	AETC257 - AETC261	AETC262	AETC3-AETC5	AETC100	AETC135	AETC101	AETC97	AETC8- AETC10	AETC11- AETC12	AETC108
	Trialx#	AETC-0002	AETC-0008	AETC-0009	AETC-0011	AETC-0012	AETC-0013	AETC-0014	AETC-0015	AETC-0016 AETC-0017	AETC-0018	AETC-0019

	Case 2:	02-cv-03830-LE	D E	ocument 339	Filed 05/23/200	8 Pa	age 24 of 65
Recip	A.T. Curley	U.S. Environmental Protection Agency	Advanced Environmental Technology Corp.	U.S. Environmental Protection Agency	U.S. Environmental Protection Agency	Advanced Environmental Technology Corp	NJ Dept of Environmental Protection
Author	R. Starkey	Advanced Environmental Technology Corp.	U.S. Environmental Protection Agency	Advanced Environmental Technology Corp.	Advanced Environmental Technology Corp.	U.S. Environmental Protection Agency	Phylis Jonas Jonas, Inc.
Summary	AETC stopped hauling spent acid and are not familiar with DeRewal operations	response to EPA letter of 9/30/92 re: request for information letter to EPA only; not including attachments to response	letter requesting a more adequate response to their letter of 9/30/92	AETC's response to EPA's letter of 12/21/92 request for information letter to EPA only; not including attachments to response	AETC's response to EPA's letter of 12/21/1992 request for information letter to EPA only; not including attachments to response	Request for information	Jonas, Inc. letter recoding of materials, landfills and recycling plants to NJ BPA
Docdate	Memorandum	Letter	Letter	Letter	Letter	Letter	Letter Exhibit Jonas-30
Docdate	4/14/1977	10/29/1992	12/21/92	1/28/1993	1/28/1993	\$661/8/11	2/18/1975
Witness	Advanced Environmental Technology Corp.	Advanced Environmental Technology Corp.	Advanced Environmental Technology Corp.	Advanced Environmental Technology Corp.	Advanced Environmental Technology Corp.	Advanced Environmental Technology Corp.	American Cyanamid
Batesrng	AETC18- AETC19	AETC1-ÁETC2	AETC25- AETC27	AETC28- AETC29	AETC37 AETC37	AETC38- AETC77	No Bates Numbers
Trialx#	AETC-0021	AETC-0025	AETC-0026	AETC-0027	AETC-0028	AETC-0030	AETC-0032

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Summary	Deposition Exhibit C.	thot 6	Deposition Exhibit	C. Dubibit	Deposition Exhibit C. Hendershot 7	Deposition Exhibit	, , , , , , , , , , , , , , , , , , ,	Deposition Exhibit C. Hendershot 8	Deposition Exhibit	~	Deposition Exhibit H.	thot 3	Hendershot 3 Deposition Exhibit	ihot 3 ion Exhibit 5	Hendershot 3 Deposition Exhibit Curley 5 Deposition Exhibit C.	hot 3 ion Exhibit ion Exhibit C. ion Exhibit C.	Hendershot 3 Deposition Exhibit Curley 5 Deposition Exhibit C. Hendershot 9 Deposition Exhibit	hot 3 ion Exhibit ion Exhibit C. ion Exhibit C. hot 9 ion Exhibit	Hendershot 3 Deposition Exhibit Curley 5 Deposition Exhibit C. Hendershot 9 Deposition Exhibit Curley 11 Curley 11 Deposition Exhibit	hot 3 ion Exhibit ion Exhibit C. hot 9 ion Exhibit C. ion Exhibit ion Exhibit ion Exhibit C. ion Exhibit C.	Hendershot 3 Deposition Exhibit Curley 5 Deposition Exhibit C. Hendershot 9 Deposition Exhibit Curley 11 Deposition Exhibit Curley 11 Deposition Exhibit C. Hendershot 1 Deposition Exhibit C. Hendershot 1 Deposition Exhibit C.	Hendershot 3 Deposition Exhibit Curley 5 Deposition Exhibit C. Hendershot 9 Deposition Exhibit Curley 11 Deposition Exhibit C. Hendershot 1 Deposition Exhibit C. Hendershot 1 Deposition Exhibit C. Hendershot 5 Deposition Exhibit C.	hot 3 ion Exhibit ion Exhibit C.	Hendershot 3 Deposition Exhibit Curley 5 Deposition Exhibit C. Hendershot 9 Deposition Exhibit Curley 11 Deposition Exhibit C. Hendershot 1 Deposition Exhibit C. Hendershot 2 Deposition Exhibit C. Curley 2 Deposition Exhibit C. Deposition Exhibit	hot 3 ion Exhibit ion Exhibit C. hot 9 ion Exhibit C. hot 1 ion Exhibit C. hot 1 ion Exhibit C. hot 5 ion Exhibit C. hot 5 ion Exhibit C. hot 5 ion Exhibit C. ion Exhibit C. ion Exhibit C.	Hendershot 3 Deposition Exhibit Curley 5 Deposition Exhibit C. Hendershot 9 Deposition Exhibit Curley 11 Deposition Exhibit C. Hendershot 1 Deposition Exhibit C. Hendershot 2 Deposition Exhibit C. Curley 2 Deposition Exhibit Curley 2 Deposition Exhibit Curley 6 Deposition Exhibit Hendershot 5 Deposition Exhibit Curley 6 Deposition Exhibit Hendershot 2	hot 3 ion Exhibit ion Exhibit C. hot 9 ion Exhibit C. hot 1 ion Exhibit C. hot 1 ion Exhibit C. hot 5 ion Exhibit ion Exhibit ion Exhibit ion Exhibit ading	hot 3 ion Exhibit ion Exhibit C. hot 9 ion Exhibit C. hot 1 ion Exhibit C. hot 5 ion Exhibit C. hot 5 ion Exhibit C. ading ading ading	ion Exhibit ion Exhibit C. ion Exhibit C. hot 9 ion Exhibit C. lon Exhibit C. hot 1 ion Exhibit C. hot 5 ion Exhibit C. hot 5 ion Exhibit C. ion Exhibit H.	ion Exhibit ion Exhibit C. ion Exhibit ion Exhibit H. ading adding	ion Exhibit ion Exhibit C. hot 9 hot 9 hot 9 hot 1 lon Exhibit C. hot 1 lon Exhibit C. hot 5 hot 5 hot 5 lon Exhibit H. ading adding adding adding adding adding	ion Exhibit ion Exhibit C. hot 9 ion Exhibit C. hot 1 ion Exhibit C. hot 1 ion Exhibit C. hot 5 ion Exhibit C. hot 5 ion Exhibit H. ading ading adding adding adding adding	ion Exhibit ion Exhibit C. hot 9 ion Exhibit C. hot 1 ion Exhibit C. hot 1 ion Exhibit C. hot 5 ion Exhibit C. hot 2 ading ading adding
92	Depositi	Hendershot 6	Depositi	Carroy	Hendershot 7	Depositi	Currey 9	Deposition Ex	Depositi	Curley 8	Depositi	Henders	Deposition E	Depositi Curley 5	Depositio Curley 5 Depositio	Hendershot 3 Deposition E: Curley 5 Deposition E: Hendershot 9	Henders Depositi Curley 5 Depositi Henders Depositi	Hendersh Depositio Curley 5 Depositio Hendersh Depositio	Henders Depositi Curley 5 Depositi Henders Depositi Curley 1	Hendershot Deposition E Curley 5 Deposition E Hendershot 9 Deposition E Curley 11 Deposition E Hendershot 9 Hendershot 1	Henders Depositi Curley 5 Depositi Henders Depositi Curley 1 Depositi Henders Henders	Hendershot 3 Deposition E Curley 5 Deposition E Hendershot 9 Deposition E Curley 11 Deposition E Hendershot 1 Deposition E Hendershot 5 Hendershot 5 Deposition E Hendershot 5	Henders Depositi Curley 5 Depositi Henders Depositi Henders Depositi Henders Depositi Henders Depositi Curley 1	Henderst Depositic Curley 5 Depositic Henderst Depositic Henderst Henderst Depositic Henderst Depositic Curley 2 Depositic	Henderst Depositic Curley 5 Depositic Henderst Depositic Henderst Henderst Henderst Curley 1 Depositic Henderst Curley 2 Depositic Curley 2 Depositic	Hendershot 3 Deposition Example 1 Curley 5 Deposition Example 2 Deposition Example 3 Deposition Example 3 Deposition Example 4 Deposition Example 3 Deposition Example 4 Deposit 4 Deposition Example 4 Deposition Example 4 Deposition Example	Henders Depositi Curley 5 Depositi Henders Depositi Henders Depositi Henders Depositi Curley 2 Depositi Curley 2 Depositi Curley 2 Depositi Curley 2 Depositi Henders	Hendershof 3 Deposition Ex Curley 5 Deposition Ex Hendershot 9 Deposition Ex Curley 11 Deposition Ex Hendershot 1 Deposition Ex Hendershot 5 Deposition Ex Curley 2 Deposition Ex Hendershot 5 Deposition Ex Curley 6 Deposition Ex Bill of Lading	Hendershof 3 Deposition Ex Curley 5 Deposition Ex Hendershof 9 Deposition Ex Curley 11 Deposition Ex Hendershof 1 Deposition Ex Hendershof 5 Deposition Ex Curley 2 Deposition Ex Curley 2 Deposition Ex Hendershof 5 Deposition Ex Curley 6 Deposition Ex Hendershof 2 Bill of Lading Bill of Lading	Hendershof 3 Deposition Ex Curley 5 Deposition Ex Hendershof 9 Deposition Ex Curley 11 Deposition Ex Hendershof 1 Deposition Ex Curley 2 Deposition Ex Curley 2 Deposition Ex Hendershof 5 Deposition Ex Curley 6 Deposition Ex Hendershof 5 Deposition Ex Curley 6 Deposition Ex Hendershof 2 Bill of Lading Bill of Lading Bill of Lading Bill of Lading Bill of Lading	Henders Depositi Curley 5 Depositi Henders Depositi Henders Depositi Henders Depositi Curley 2 Depositi Henders Depositi Henders Depositi Curley 6 Depositi Henders Bill of L Bill of L Bill of L	Hendershot 3 Deposition Ex Curley 5 Deposition Ex Hendershot 9 Deposition Ex Curley 11 Deposition Ex Hendershot 1 Deposition Ex Curley 2 Deposition Ex Curley 2 Deposition Ex Curley 2 Deposition Ex Curley 2 Deposition Ex Curley 6 Deposition Ex Curley 1 Deposition Ex Curley 1 Deposition Ex Curley 2 Deposition Ex Curley 3 Deposition Ex Curley 6 Deposition Ex Curley 1 Deposition Ex Curley 2 Deposition Ex Curley 3 Deposition Ex Curley 3 Deposition Ex Curley 4 Deposition Ex Curley 6 Deposition Ex Curley 1 Deposition Ex Curley 1 Deposition Ex Curley 6 Deposition Ex Curley 6 Deposition Ex Curley 1 Deposition Ex Curley 1 Deposition Ex Curley 2 Deposition Ex Curley 3 Deposition Ex Curley 4 Deposition Ex Curley 6 Deposition Ex Curley 1 Deposition Ex Curley 1 Deposition Ex Curley 2 Deposition Ex Curley 3 Deposition Ex Curley 6 Deposition Ex Curley 6 Deposition Ex Curley 6 Deposition Ex Curley 1 Deposition Ex Curley 2 Deposition Ex Curley 3 Deposition Ex Curley 3 Deposition Ex Curley 6 Deposition Ex Curley 1 Deposition Ex Curley 2 Deposition Ex Curley 3 Deposition Ex Curley 3 Deposition Ex Curley 4 Deposition Ex Curley 5 Deposition Ex Curley 6 Deposition Ex Curley 7 Deposition Ex Curley 7	Hendershot 3 Deposition Exh Curley 5 Deposition Exh Hendershot 9 Deposition Exh Hendershot 1 Deposition Exh Hendershot 1 Deposition Exh Hendershot 5 Deposition Exh Curley 2 Deposition Exh Hendershot 2 Deposition Exh Hendershot 2 Deposition Exh Hendershot 2 Deposition Exh Hendershot 2 Bill of Lading
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Datestug	ASHL00062		ASHL00002-	A CLI 00062	ASHLUUUUOS	BSA1033355 -	DSAL033330	ASHL00124	BSAI033357 -	BSA1055558	ASHL00137	!	BSAI006529 -	BSA1006529 - BSA1006530	BSA1006529 - BSA1006530 ASHL00139	BSA1006529 - BSA1006530 ASHL00139	BSA1006529 - BSA1006530 ASHL00139 BSA1001067	BSA1006529 - BSA1006530 ASHL00139 BSA1001067	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00172	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00172	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00172 ASHL00056	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00056 BSA1006479 -	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00056 ASHL00056 BSA1006479 - BSA1006481	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00056 ASHL00056 BSA1006479 - BSA1006573 BSA1006573	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00056 ASHL00056 BSA1006479 - BSA1006479 - BSA1006479 - BSA1006573 BSA1006574 ASHL00093	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00172 ASHL00056 BSA1006479 - BSA1006471 BSA1006573 BSA1006573 ASHL00093	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00056 ASHL00056 BSA1006479 - BSA1006573 BSA1006574 ASHL00093 ASHL00093	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00056 ASHL0006481 BSA1006479 - BSA1006573 BSA1006573 ASHL00093 ASHL00064 ASHL00064	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00056 ASHL0006481 BSA1006479 - BSA1006479 - BSA1006474 ASHL00064 ASHL00064 ASHL00077 ASHL00077	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00056 ASHL00056 BSA1006479 - BSA1006479 - BSA1006479 - BSA1006479 - ASHL00064 ASHL00064 ASHL00072 ASHL00077 ASHL00077	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00076 BSA1006481 BSA1006479 - BSA1006479 - BSA1006479 - BSA1006479 - BSA1006474 ASHL00072 ASHL00077 ASHL00077 ASHL00077 ASHL00077 ASHL00077 ASHL00077 ASHL00077 ASHL00077	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00056 BSA1006481 BSA1006481 BSA1006573 BSA1006573 ASHL00077 ASHL00077 ASHL00077 ASHL00077 ASHL00095 ASHL00095 ASHL00095 ASHL00095 ASHL00095	BSA1006529 - BSA1006530 ASHL00139 BSA1001067 ASHL00056 ASHL00064 ASHL00077 ASHL00077 ASHL00084 ASHL00095
Trialx#	AETC-0214		AETC-0215	A D.T.C 0215	AE1C-0213	AETC-0216	7.00	AETC-0216	AETC-0217		AETC-0217		AETC-0218	AETC-0218	AETC-0218 AETC-0218	AETC-0218 AETC-0218	AETC-0218 AETC-0218 AETC-0219	AETC-0218 AETC-0218 AETC-0219	AETC-0218 AETC-0218 AETC-0219 AETC-0219	AETC-0218 AETC-0218 AETC-0219 AETC-0219	AETC-0218 AETC-0218 AETC-0219 AETC-0230	AETC-0218 AETC-0219 AETC-0219 AETC-0230 AETC-0231	AETC-0218 AETC-0219 AETC-0219 AETC-0230 AETC-0231	AETC-0218 AETC-0219 AETC-0219 AETC-0230 AETC-0231	AETC-0218 AETC-0219 AETC-0219 AETC-0231 AETC-0231 AETC-0237	AETC-0218 AETC-0219 AETC-0219 AETC-0231 AETC-0237 AETC-0237	AETC-0218 AETC-0219 AETC-0219 AETC-0231 AETC-0231 AETC-0237 AETC-0255	AETC-0218 AETC-0219 AETC-0219 AETC-0231 AETC-0231 AETC-0237 AETC-0255 AETC-0255	AETC-0218 AETC-0219 AETC-0219 AETC-0231 AETC-0237 AETC-0254 AETC-0255 AETC-0255	AETC-0218 AETC-0219 AETC-0219 AETC-0231 AETC-0237 AETC-0255 AETC-0255 AETC-0255 AETC-0255 AETC-0255	AETC-0218 AETC-0219 AETC-0219 AETC-0231 AETC-0237 AETC-0255 AETC-0256 AETC-0258 AETC-0258 AETC-0258	AETC-0218 AETC-0219 AETC-0219 AETC-0231 AETC-0237 AETC-0255 AETC-0255 AETC-0258 AETC-0258 AETC-0258 AETC-0258 AETC-0258 AETC-0258	AETC-0218 AETC-0219 AETC-0219 AETC-0230 AETC-0231 AETC-0237 AETC-0255 AETC-0258 AETC-0258 AETC-0258 AETC-0258 AETC-0258 AETC-0258 AETC-0258 AETC-0258

Г	Cas	e 2:	02-cv	v-03 8	330-	LDD		ocur	nent	339	F	filed	05/2	3/20	80	Pa	ge 2	8 of	65
Recip	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.													
Author	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co
Summary	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Biil of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading
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Docdate	3/15/1977	3/17/1977	3/18/1977	3/18/1977	3/19/1977	9/61/61/8	8/20/1976	8/25/1976	9/56/1976	8/26/1976	8/27/1976	8/31/1976	9/61/1/6	9/2/16/6	9/4/1/6	9/8/19/6	9/8/1976	9/10/1976	9/13/1976
Witness	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland
Batesrng	ASHL00210	ASHL00211	ASHL00212	ASHL00215	ASHL00217	ASHL00008 - ASHL00009	ASHL00010	ASHL00039	ASHL00040	ASHL00041 ASHL00042	ASHL00043	ASHL00044	ASHL00049	ASHL00050	ASHL00052	4SHL00054	ASHL00055	ASHL00058 -	ASHL00060
Trialx#	AETC-0282	AETC-0283	AETC-0284	AETC-0285	AETC-0286	AETC-0287	AETC-0288	AETC-0289	AETC-0290	AETC-0291	AETC-0292	AETC-0293	AETC-0294	AETC-0295	AETC-0296	AETC-0297	AETC-0298	AETC-0299	AETC-0300

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Recip	Advanced Envirotech Co.	Advanced Envirotech Co,																	
Author	Ashland Chemical Co																		
Summary	Bill of Lading																		
Docdate	Bill of Lading																		
Docdate	9/14/1976	9/16/191/6	9/17/1976	9/14/1976	9/21/16/6	9/21/1976	9/24/1976	9/27/1976	9/28/1976	9/28/1976	9/29/1976	10/1/1976	10/5/1976	10/4/1976	10/6/1976	10/00/1970	10/7/1976	10/8/1976	10/12/1976
Witness	Ashland																		
Batesrng	ASHL00061	ASHL00065	ASHL00070	ASHL00071	ASHL00075	ASHL00076	ASHL00078	ASHL00080	ASHL00081	ASHL00082	ASHL00083	ASHL00087	ASHL00088	ASHL00089	ASHL00091	ASHL0Q092	ASHL00093	ASHL00094	ASHL00096
Trialx#	AETC-0301	AETC-0302	AETC-0303	AETC-0304	AETC-0305	AETC-0306	AETC-0307	AETC-0308	AETC-0309	AETC-0310	AETC-0311	AETC-0312	AETC-0313	AETC-0314	AETC-0315	AETC-0316	AETC-0317	AETC-0318	AETC-0319

Recip	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Enviratech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.				
Author	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co
Summary	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bili of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading
Docdate	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading
Docdate	10/12/1976	10/12/1976	10/13/1976	10/14/1976	10/14/1976	10/15/1976	10/18/1976	9/61/61/01	10/20/1976	10/25/1976	10/27/1976	10/29/1976	11/4/1976	11/4/1976	9/61/5/11	11/9/1976	9/61/51/11	11/18/1976	11/24/1976
Witness	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland
Batesrng	ASHL00097	ASHL00098	ASHL00099	ASHL00105	ASHL00106	ASHL00108	ASHL00109	ASHL00110	ASHL00114	ASHL00117	ASHL00120	ASHL00121	ASHLOO122	ASHL00125	ASHLOO126	ASHLOO128	ASHLO0129	ASHL00131	ASHLOO133
Trialx#	AETC-0320	AETC-0321	AETC-0322	AETC-0323	AETC-0324	AETC-0325	AETC-0326	AETC-0327	AETC-0328	AETC-0329	AETC-0330	AETC-0331	AETC-0332	AETC-0333	AETC-0334	AETC-0335	AETC-0336	AETC-0337	AETC-0338

Document 339

Filed 05/23/2008

	Cas	e 2:	02-c	v-038	3 30-	LDD	D	ocur	nent	339	F	iled	05/2	3/20	08	Pa	ge 3	1 of	65
Recip	Advanced Envirotech Co.																		
Author	Ashland Chemical Co																		
Summary	Bill of Lading																		
Docdate	Bill of Lading																		
Docdate	11/30/1976	12/3/1976	12/9/1976	12/15/1976	1/29/1977	1/31/1977	12/1/1977	2/2/1977	2/3/1977	2/9/1977	2/10/1977	2/11/1977	2/14/1977	2/15/1977	2/17/1977	2/18/1977	2/19/1977	2/19/1977	2/22/1977
Witness	Ashland	Ashiand	Ashland																
Batesrng	ASH L00134	ASHL00135	ASHL00136	ASHL00138	ASHL00142	ASHL00143	ASHL00145	ASHL00146	ASHL00148	ASHL00154	ASHL00156	ASHL00163	ASHL00164	ASHL00166	ASHL00168	ASHL00170	ASHL00174 ASHL00176	ASHL00178	ASHL00179
Trialx#	AETC-0339	AETC-0340	AETC-0341	AETC-0342	AETC-0343	AETC-0344	AETC-0345	AETC-0346	AETC-0347	AETC-0348	AETC-0349	AETC-0350	AETC-0351	AETC-0352	AETC-0353	AETC-0354	AETC-0355	AETC-0356	AETC-0357

	Cas	e 2:0)2-c	v-038	330 -	DD	D	ocur	nent	339	F	iled	05/2	3/20	08	Pa	ge 3	2 of	65
Recip	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.	Advanced Envirotech Co.													
Author	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashiand Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co	Ashland Chemical Co					
Summary	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading								
Docdate	Bill of Lading	Bill of Lading	Bill of Lading	Bili of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading	Bill of Lading					
Docdate	2/22/1977	2/23/1977	2/23/1977	2/26/1977	3/1/1977	3/1/1977	3/2/1977	3/3/1977	3/3/1977	3/4/1977	3/7/1977	3/7/1977	3/8/1977	3/11/1977	3/15/1977	3/21/1977	3/21/1977	3/22/1977	3/22/1977
Witness	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland								
Batesrng	ASHL00180	ASH LO0182	ASH L00184	ASHL00187	ASHL00193	ASH L00194	ASHL00195	ASH L00197	ASHL00198	ASHL00199	ASHL00200	ASHL00201	ASHL00203	ASHL00207	ASHL00209	ASHL00219	ASHL00220	ASHL00221	ASHL00222
Trialx#	AETC-0358	AETC-0359	AETC-0360	AETC-0361	AETC-0362	AETC-0363	AETC-0364	AETC-0365	AETC-0366	AETC-0367	AETC-0368	AETC-0369	AETC-0370	AETC-0371	AETC-0372	AETC-0373	AETC-0374	AETC-0375	AETC-0376

	Cas	e 2:	02-c	y-03	830-	LDD	D	ocur	nent	339	F	iled	05/2	3/20	08	Pa	g e 33 c	of 65
Recin	Advanced Envirotech Co.	Advanced Environmental Tech Corp																
Author	Ashland Chemical Co	DeRewal Chemical Co Inc																
Summary	Bill of Lading	Invoice from DeRewal to Advanced Environmental Tech																
Docdate	Bill of Lading	Invoice																
Docdate	3/23/1977	3/24/1977	3/24/1977	03/25/0000	3/25/1977	3/28/1977	3/28/1977	3/29/1977	3/31/1977	4/2/1977	4/5/1977	4/5/1977	4/5/1977	4/12/1977	4/12/1977	9261/2/01	3/19/1977	
Witness	Ashland																	
Batesrng	ASHL00223	ASHL00224	ASHL00225	ASHL00227	ASHL00228	ASHL00229	ASHL00230	ASHL00231 - ASHL00232	ASHL00233 - ASHL00234	ASHL00239	ASHL00246	ASHL00247	ASHL00248	ASHL00251	ASHL00252	ASHL00107	BSA1022994	
Trialx#	AETC-0377	AETC-0378	AETC-0379	AETC-0380	AETC-0381	AETC-0382	AETC-0383	AETC-0384	AETC-0385	AETC-0386	AETC-0387	AETC-0388	AETC-0389	AETC-0390	AETC-0391	AETC-0394	AETC-0395	

	Case 2:	02-cv-()3830-LDD		ocumen	1 3	39	Fil	ed	0:	5/23/	20	800	Pa	ge 34 of 65
Recip	W.R. Starkey	A.T. Curley	A.T. Curley C.A. Aidag J. Minott J.W. Sigan H.E. Sullivan	Advanced Envirotech Co		· ·	Schoening.G Ashland Chemicals	Harris, GA							
Author	A.T. Curley	J. Minott/W.R. Starkey	W.R. Starkey	Ashland Chemical Co		Ashland	DeGarmo Ashland	Cosiett.RC De Maximis Inc	n, wang kida da kida d					77,44	
Summary	Memo re: waste chemical disposal p2. "signing of a secrecy agreement"	Visit to Disposal Site for CDN acid (Ashland)	CDN Spent Acid Disposal	Bill of Lading	Ledger for waste removal dates ranging from 7/27/76 - 8/25/76	Ledger	Email	Email	Ledger	bldg 6 waste business	Letter	Letter	Waste Chemical Disposal Update	Memo re: CDN Spend Acid Disposal	Memo regarding meeting with Leuzarder and DeRewal concerning waste removal and treatment
Docdate	Memorandum	Memorandum	Memorandum	Bill of Lading	Ledger	Chart / Graph	E-Mail	E-Mail	Ledger	Ledger	Letter	Letter	Memorandum	Memorandum	Memorandum
Docdate	8/23/1976	9/61/61/01	4/14/1977	9/16/1976	00/00/1976	04/00/1977	11/6/2003	10/13/2003	2/18/1977	09/00/1976	1/11/1996	9/61/91/8	8/23/1976	4/14/1977	9/20/1976
Witness	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland	Ashland
Batesrng	BSAI006479 - BSAI006481	BSA1006573 - BSA1006574	BSAI006634 - BSAI006635	ASHL00063	BSA1033916	BSAI001067	BSAI103003	BSA1103029	BSA1033938	BSA10024276	ASHL00318- ASHL00324	AETC178	BSA10022954- BSA10022956	BSA1002959- BSA1022960	BSA1006529-
Trialx#	AETC-0401	AETC-0406	AETC-0407	AETC-0409	AETC-0414	AETC-0419	AETC-0420	AETC-0421	AETC-0423	AETC-0424	AETC-0425	AETC-0426	AETC-0427	AETC-0429	AETC-0430

	Case	2:02-c	v-0383	0-LDD	Doo	ument 339	Fil	ed 05/2	23/2		Page 35 of	65
Recip				1 77 98 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4		E. Straka (Carepenter Tech.)	E. Straka (Carepenter Tech.)	EPA	Roth, E King of Prussia Technical Sales	US District Court for the Eastern District of PA		77.148
Author			7. 9.45		Ashland Chemical Co	DeRewal Chemical Co.	DeRewal Chemical Co.	Michael Carpenter	Carpenter Technology Corp	Polinko.CT	Howard Miller Carpenter Technology	Mann.DE Carpenter Technology Corp
Summary	Deposition Exhibit Curley 16	Deposition Exhibit Curley 18	Deposition Exhibit Curley 4	Deposition Exhibit Curley 17	Deposition Exhibit Leuzarder 5	Outlining waste removal services; hydrochloric acid waste will go to Sylvan Chemical Corp	Outlining waste removal services	WR Grace response to EPA request for information	CarTech waste acid information Mann-15	Affidavit of Charles Polinko	Department of the Army, Corps of Engineers application for permit to discharge or work in navigable waters and their tributaries	Memorandum Mann 14
Docdate	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Letter	Letter	104(e) response	Letter	Legal Document	Application	Memo
Docdate	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	11/27/1972	11/27/1972	4/14/1988	2/25/1971	0000/00/00	7/26/1972	2/25/1970
Witness	Advanced Environmental	Advanced Environmental Technology Corp.	Advanced Environmental Technology Corp.	Ashland Advanced Environmental Technology Corp.	Ashland Advanced Environmental Technology Corp.	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter
Batesrng	AETC178	AETC180-182	AETC184- AETC190	AETC183	AETC197- AETC199	BSA120448	BSAI02044 9	No Bates numbers	C301137- C301138	No Bates Numbers	CART0280	CART 0023
Trialx#	AETC-0431	AETC-0432	AETC-0433	AETC-0434	AETC-0435	AETC-0437	AETC-0439	AETC-0440	.AETC-0449	AETC-0450	AETC-0451	AETC-0453

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DMEAST #10044758 v1

	Cas	e 2:02	cv-03	830-LE		ocur	nent	339		iled	05/23/	2008	3 1	Page	36	pf 65
Recip	Carpenter Tech	USEPA									Carpenter Technology Corporation				Carpenter Tech	
Author	USEPA	Carpenter Technology Corporation	Carpenter Technology Corporation	Carpenter Technology Corporation	Carpenter Technology Corporation							7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	and the second s		USEPA	
Summary	request for information	responses to BPA's 104(e) requests	Pennsylvania Industrial Wastes Permit	Submission to PADEP regarding plant processing	Waste Acid Disposal Costs memo Exhibit Mann-4	Deposition Exhibit Adams 2	Deposition Exhibit Adams 3	Deposition Exhibit - Mann 3	Deposition Exhibit Mann 2	Deposition Exhibit P-35	Sampling Report	Deposition Exhibit Mann 12	Deposition Exhibit Mann 13	Deposition Exhibit Mann 15	request for information	Deposition Exhibit Mann 14
Docdate	Letter with Attac	Letter with Attac	Permit	Industrial Waste	Memo	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Sampling Repor	Exhibit	Exhibit	Exhibit	Letter	Exhibit
Docdate	11/8/1995	1/21/2000	12/31/1963	9/28/1971	10/8/1974	0000/00/00	0000/00/00	0000/00/00	00/00/00	0000/00/00	5/1/1973	00/00/00	0000/00/00	0000/00/00	8861/01/9	00/00/00
Witness	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter
Batesrng	BAS1025223- BSA1025235	BSA1025169 BSA1025217	CART0250- CART0255	CART0273	CART0027 - CART0028	No Bates Numbers	No Bates Numbers	C018466	No Bates Numbers	CART0001 - CART0003	CART0192	C303983- C303989	C303989- C303990 —	C301137- C301138	BSA1025236- BSA1025238	CART0023
Trialx#	AETC-0456	AETC-0463	AETC-0526	AETC-0527	AETC-0531	AETC-0541	AETC-0542	AETC-0544	AETC-0555	AETC-0558	AETC-0567	AETC-0569	AETC-0570	AETC-0571	AETC-0620	AETC-0622

Witness
2/17/1991
Summary
Diaz Chemical 00/00/0000 Invoice
7/30/2003 Invoice
Flexible/Etched 6/20/1988 104(e) response
Flexible/Etches 9/11/1987 104(e) response
Flexible/Etched 7/13/1985 Corporate
Flexible/Etched 10/06/0972 Agreement
Flexible/Etched 3/2/1973 Letter
Flexible/Etched 10/27/1988 Report/Study
Flexible/Etched 10/2/1987 104(e) response
Flexible/Etched 10/2/1987 Letter
Flexible/Etched 9/11/1987 Letter
Flexible/Etched 11/27/1974 Invoice

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Recip	Flexible Circuits Inc		Flexible Circuits Inc	Flexible Circuits Inc	Flexible Circuits Inc		Flexible Circuits Inc	DeRewal Chemical Co Inc	Flexible Circuits Inc	DeRewal Chemical Co Inc	Flexible Circuits Inc	Flexible Circuits Inc	Flexible Circuits Inc	Flexible Circuits Inc	Flexible Circuits Inc	Flexible Circuits Inc	DeRewai Chemical Co Inc	Flexible Circuits Inc	DeRewai Chemical Co Inc	DeRewai Chemical Co Inc	Flexible Circuits Inc
Author	Passmore.B	Commonwealth of PA	Commonwealth of PA	Commonwealth of PA	Commonwealth of PA		DeRewal Chemical Co Inc	Flexible Circuits Inc	DeRewal Chemical Co Inc	Flexible Circuits Inc	DeRewai Chemical Co Inc	DeRewai Chemical Co Inc	DeRewai Chemical Co Inc	DeRewai Chemical Co Inc	DeRewa! Chemical Co Inc	DeRewai Chemical Co Inc	Flexible Circuits Inc	DeRewai Chemical Co Inc	Flexible Circuits Inc	Flexible Circuits Inc	DeRewai Chemical Co Inc
Summary	Report		Report	Report	Report	Deposition Exhibit P-39	DeRewal Invoice to Flexible Circuits	Flexible Circuits Invoice to DeRewal	Flexible Circuits Invoice to DeRewal	Flexible Circuits Invoice to DeRewal	DeRewal invoice to Flexible Circuits	DeRewai Invoice to Flexible Circuits	Invoice	Invoice	Invoice	Invoice	Invoice	Invoice	Invoice	Invoice	Invoice
Docdate	Waste	Discharg	Waste Discharg	Waste Discharg	Waste Discharg	Exhibit	Invoice	Financial	Invoice	Financial	Invoice	Invoice	Invoice	Invoice	Invoice	Invoice	Financial	Invoice	Financial	Financial	Invoice
Docdate	10/19/1972		10/25/1972	1/12/1973	3/15/1973	0000/00/00	11/26/1974	3/21/1975	1/6/1975	7/14/1975	5/31/1975	5/31/16/2	11/25/1974	9/26/1974	10/9/1973	11/7/1973	01/24/0000	12/11/1973	0000/00/00	9/16/1974	7/25/1974
Witness	Flexible/Etched		Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched	Flexible/Etched
Batesrng	BSAI082653		BSA1082660	BSA1082663	BSAI082664	No Bates Numbers	FLEX00070	FLEX00060	FLEX00062	FLEX00057	FLEX00059	FLEX00058	FLEX00071	FLEX00075	FLEX00095	FLEX00094	FLEX00090	FLEX00092	FLEX00065	FLEX00085	FLEX00088
Trialx#	AETC-0761		AETC-0762	AETC-0763	AETC-0780	AETC-0819	AETC-0829	AETC-0830	AETC-0831	AETC-0832	AETC-0833	AETC-0834	AETC-0835	AETC-0836	AETC-0837	AETC-0838	AETC-0839	AETC-0840	AETC-0841	AETC-0842	AETC-0843

Γ	Cas	e 2:	02-c	v-03	830-	LDD D	cument 339 Filed 05/23/2008 Par	ge 40 of 65
Recip		H. Zia (USEPA)	Philco- Ford	Philco- Ford	Philco- Ford		Philco- Ford Philco- Ford Philco- Ford	
Author		G. Stollsteimer (Flexible Circuits)	DeRewal Chemical Co.	DeRewal Chemical Co.	DeRewal Chemical Co.		DeRewal Chemical Co. DeRewal Chemical Co. DeRewal Chemical Co.	
Summary	Deposition Exhibit Stollsteimer GS-15	Response to USEPA's letter of 10/15/1987	Removal of drums - waste finishing material	Removal of industrial waste solution	Drums - waste finishing material	Settlement Agreement between Certain Plaintiff Settling Parties and Agere Systems, Inc.	Response to USEPA's Request for Information, along with Ford's supporting documents; and EPA's 4/12/1994 104(e) Request for Information to Ford [not including cover letter] Removal of waste finishing material Removal of drums containing waste finishing material Removal of drums - waste finishing material	Analytical results of sampling performed on Philco Ford materials recovered from the site. DeRewal invoices to Ford
Docdate	Exhibit	Letter	Invoice	Invoice	Invoice	Agreement	EPA Invoice Invoice Invoice	Keport / Study Invoice
Docdate	0000/00/00	2861/9/11	8/17/1972	7/16/1972	10/31/1973	3/29/2007	3/24/1972 8/17/1972 10/31/1973	0000/00/00
Witness	Flexible/Etched	Flexible/Etched	Ford	Ford	Ford	Ford	Ford Ford	Ford
Batesrng	FLEX00086- FLEX00077	FLEX00004- FLEX00005	BSAI006116	BSAI006155	BSA1006153	BSA1102980- BASI102993	003665 BSA1006103 BSA1006105 BSA1006115	FOKD000032 BSAI003474- BSAI003478
Trialx#	AETC-0915	AETC-0921	AETC-0925	AETC-0926	AETC-0927	AETC-0928	AETC-0930 AETC-0931 AETC-0932	AETC-0934

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Recip	Bob Costello	Ford Motor Company			DeRewal Chemical			DeRewal Chemical			DeRewal Chemical			Philco Ford Corp			Philco Ford Corp			Philco Ford Corp		DeRewal Chemical Co			Philco Ford Corp			1000	Durelle Chemical								
Author	Larry S. Miller	US EPA			Philco Ford Corp			Philco Ford Corp	-		Philco Ford Corp			DeRewal	Chemical Co		DeRewal Chemical	Co		DeRewal Chemical Co	Inc	Philco Ford Corp			DeRewal Chemical Co	Inc			Philco Ford Corp								
Summary	104(e) request for	information, along with	cover sheet stating	request for information	Ford Invoice to	DeRewal Chemical for	waste material plastics	Ford Invoice to	DeRewal Chemical for	waste material plastics	Ford Invoice to	DeRewal Chemical for	waste material finishing	Invoice for waste	finishing material	removed.	Invoice for	industrial waste	removed.	Invoice for finishing	waste removed.	Invoice to DeRewal	Chemical for waste	finishing material	Telephone	Conversation on the	Removal of Liquid	Waste to Ford	Invoice to Durelle	Chemical for waste	finishing material						
Docdate	104(e) request				Invoice			Invoice			Invoice			Invoice			Invoice			Invoice		Invoice			Letter				Invoice								
Docdate	4/12/1994				4/20/1973			4/26/1973			5/9/1973			3/24/1972			7/14/1972			10/31/1973		3/28/1973			1/21/1972				2/12/1973								
Witness	Ford				Ford			Ford			Ford			Ford			Ford			Ford		Ford			Ford				Ford								
Batesrng	BSAI006044-	BSAI006052			FORD000131			FORD000132			FORD000134			FORD000009			FORD000010-	FORD000011		FORD000012-	FORD000013	FORD000130			FORD000123				FORD000128								
Trialx#	AETC-0937		,		AETC-0938			AETC-0939			AETC-0940			AETC-0941			AETC-0942			AETC-0943		AETC-0944			AETC-0945			(AETC-0947								

	Case 2:02-cv-03830-LDD	Docum	ent 339 Filed	1 05/23	/20 0	8 Pag	e 42 of 6 5
Recip	C. Mullican	T. Falahee (Ford)		Handy & Harman Tube Company, Inc.	Handy & Harman	US Environmental Protection Agency	J.E. Martin-Banks U.S. EPA
Author	MDS Laboratories	L Miller (PRP Investigator)		RMC Environmental Services, Inc.	DeRewal Chemical Co.	Handy and Harman Tube Co Inc	Handy & Harman
Summary	MDS Laboratory Reports, Waste Manifests between USEPA and Chem-Met Services, Inc. (Michigan), Site Records Identifying Philco-Ford {DeRewal Invoices and correspondence to Philco-Ford), Philco- Ford Invoices to DeRewal	USEPA seeking information re: possible hazardous releases	Objections and Responses of Boarhead Farm Agreement Group to Interrogatories (First Set) of Defendant Thomas & Betts Corporation	Site investigation report	Invoice #571 — Shipping of industrial waste drums	Information regarding waste disposal and DeRewal	Handy & Harman's Supplemental Responses to U.S. EPA's Request
Docdate	Misc. Document	Letter	Pleading	Report/Study	Invoice	104(e) Respons	Letter
Docdate	7/2/1993	0000/00/00	9/14/2004	09/00/1992	2/5/1973	10/29/1992	1/7/1993
Witness	Ford	Ford	Ford	Handy & Harman	Handy & Harman	Handy & Harman	Handy & Harman
Batesrng	FORD000088-	FORD000495- FORD000516	No Bates Numbers	No Bates Numbers	BSAI030932	No Bates Numbers	BSAI030914- BSAI030917
Trialx#	AETC-0948	AETC-0950	AETC-0951	AETC-0952	AETC-0963	AETC-0964	AETC-0965

Jon		as as as as as as	as Tr.	as Truck as Truck as Truck as Truck as Truck as Truck	as Trucking	Jonas Trucking Jonas Trucking Jonas Trucking Jonas Trucking Jonas Trucking Co
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spent acid ferric chloride removal	spent acid ferric chloride removal spent acid removal spent acid removal spent acid	spent acid ferric chloride removal spent acid removal spent acid removal spent acid ferric chloride waste acid Pitney Hardin Receipts by trust fund	spent acid ferric chloride removal spent acid removal spent acid removal spent acid removal spent acid ferric chloride waste acid by trust fund Pitney Hardin Receipts by trust fund Pitney Hardin Receipts by trust fund Pitney Hardin Acceipts by trust fund Pitney Hardin Receipts	spent acid ferric chloride removal spent acid removal spent acid removal spent acid removal spent acid ferric chloride waste acid by trust fund Pitney Hardin Receipts by trust fund Pitney Hardin Receipts by trust fund Montgomery McCracken receipts Montgomery McCracken	spent acid ferric chloride removal spent acid removal spent acid removal spent acid removal spent acid ferric chloride waste acid by trust fund Pitney Hardin Receipts by trust fund Pitney Hardin Receipts by trust fund Montgomery McCracken receipts	spent acid ferric chloride removal spent acid removal spent acid removal spent acid removal spent acid removal ferric chloride waste acid by trust fund Pitney Hardin Receipts by trust fund Pitney Hardin Receipts by trust fund Montgomery McCracken receipts
		nal Rolling nal Rolling nal Rolling nal Rolling nal Rolling	nal Rolling	nal Rolling	nal Rolling	nal Rolling
			BSA1074200 N BSA1074203 N BSA1074295 N BSA1074274 N BSA1094485- N BSA1094486 N BSA1094486 N BSA1094486 N BSA1094486 N BSA1094486 N BSA1094480 N BSA1094480 N BSA1094480 N			
,	رفا دوا دوا	معامدا مما مما				AETC-0970 B AETC-0971 B AETC-0974 B AETC-0976 B AETC-0978 B AETC-0978 B AETC-0979 B AETC-0987 B AETC-0993 B AETC-0993 B

Document 339

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	Cas	e 2:02-cv-()3830-	LDD	Doo	rument 339	Filed 0	5/23/2008	Pa	ige 4	5 of	65
Recip	Jonas Trucking	Advanced Envirotech Co, Standard Pressed Steel Tech, Ford Motor, NRM, Vorys Satar, Scangarella & Lucent. Ciba	National Rolling Mills	Jonas Trucking		Dept of Navy	Fumara.S Naval Air Development Center		Standard Pressed Steel	Standard Pressed Steel	DeRewal Chemical Co Inc	DeRewal Chemical Co
Author	National Rolling Mills Co	Farleigh Earhart	Worthington Steel	National Rolling Mills Co		PADER	DeRewal,M		DeRewal Chemical Co Inc	DeRewal Chemical Co Inc	Standard Pressed Steel Co	Standard Pressed Steel Co
Summary	Bill of Lading	Draft report and Invoice by Jeremy Akers of Environmental Strategies Mgmt	deed for land in East Whiteland Township, PA	waste acid	interview summary REDACTED	Request Concerning the Disposal of an Extremely Hazardous Cyanide Waste Generated by a Metal Finishing Operation at the Center	agreeing to hold harmless Naval waste materials	SPS reply-comments on SPS being a major hazardous waste generator, references "smoking	regarding waste removal	regarding waste removal	chromic acid waste	cyanide and chromic acid, acetone
Docdate	Bill of Lading	Facsimile	Deed	Bill of Lading	Interview Summ	Letter	Letter	104(e) response	Invoice	Invoice	Shipping Order	Purchase Order
Docdate	7/11/1975	8/31/1698	11/11/2004	8/18/1975	12/4/1996	9/61/ <i>L</i> /6	9/11/1/5	2/5/1996	8/5/1976	12/2/1976	3/30/1973	6/6/1973
Witness	National Rolling Mills	National Rolling Mills	National Roiling Mills	National Rolling Mills	National Rolling Mills Navy Flexible/Etched	Navy	Navy	Standard Pressed Steel	Standard Pressed Steel	Standard Pressed Steel	Standard Pressed Steel	Standard Pressed Steel
Batesrng	BSAI074270	BSAI075498- BSAI075509	BSA1074172- BSA1074183	BSAI074292	RAHN-0018	NAVY0002	NAVY0001	BSAI01395	SPST00173	SPST00175	SPST00140	SPST00141
Trialx#	AETC-1064	AETC-1065	AETC-1066	AETC-1067	ĀETC-1073	AETC-1079	AETC-1080	AETC-1083	AETC-1085	jAETC-1086	AETC-1087	AETC-1088

	Cas	se 2:	02	CV-C	383	0-LE	D	Doc	ume	nt 3	39	F	ilε	d	05/2	<mark>3/20</mark>	80	Pa	ge 4	8 of 65
Recip						- Printed						Techalloy Co Inc	Techalloy Co Inc	Techalloy Co Inc	Liquid Removal Service	PADER	Liquid Removal Service	7 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	The control of the co	
Author			Techalloy Co Inc	2				The state of the s				DeRewal Chemical Co	PADER	PADER	Tachalloy Co Inc	Techalloy Co Inc	Techalloy Co Inc	Techalloy Co Inc	WAS CITED OF	
Summary	certification of Robert Leister	certification of R.Leistesr	account code of vendors	hand drawn map of TechAHoy	plumbing permit to connect to public sewer	hand drawn map of TechANoy	Deposition Exhibit Senin	Deposition Exhibit Senin 2	Deposition Exhibit Moran 2	Deposition Exhibit Moran 1	Deposition Exhibit P-37	waste oil removal	waste inspection report	waste inspection report	removal of industrial waste	submitting pollution incident report	removal of industrial waste	plumbing permit to connect to public sewer	Deposition Exhibit P-52	FEASIBILITY STUDY (FS) REPORT - PART 1 OF 23
Docdate	Certification	Exhibit	Financial	Drawing	Application	Drawing	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Invoice	Report	Report	Invoice	Letter	Invoice	Application	Exhibit	Report
Docdate	12/16/1992	0000/00/00	2/24/2005	0000/00/00	9/6/1972	0000/00/00	0000/00/00	0000/00/00	06/00/1972	4/10/1974	0000/00/00	8/10/1972	8/20/1971	6/5/1972	11/28/1973	10/12/1972	11/28/1973	9/6/1972	0000/00/00	07/00/1997
Witness	Techalloy	Techalloy	Techalloy	Techalloy	Techalloy	Techalloy	Techalloy	Techalloy	Techalloy	Techalloy	Techalloy	Techalioy	Techalloy	Techalloy	Techalloy	Techalloy	Techalloy	Techalloy		
Batesrng	RAHN-0015	RAHN-0011	RAHN-1222	RAHN-1252	RAHN-1251	RAHN-1252	RAHN-1222	RAHN-1222- RAH-1249	RAHN-1251 - RAHN-1259	No Bates Numbers	BSA1032975	RAHN-0017	RAHN-0622	RAHN-0610	RAHN-0014	RAHN-0013	RAHN-0014	RAHN-1251	BSA1029144- BSA1029263	AR313859- AR313859
Trialx#	AETC-1150	AETC-1151	AETC-1153	AETC-1154	AETC-1155	AETC-1156	AETC-1163	AETC-1164	AETC-1165	AETC-1166	AETC-1171	AETC-1172	AETC-1173	AETC-1174	AETC-1175	AETC-1176	AETC-1177	AETC-1178	AETC-1222	AETC-1225

Trialx#	Batesrng	Witness	Docdate	Docdate	Summary	Author	Recip
AETC-1226	AR313720-		07/00/1997	Report	FEASIBILITY		
	AR313859				STUDY (FS)		
					REPORT -		
					PART 2 OF 23		2:(
AETC-1227	AR400013-		6/18/1992	Report	FEDERAL ON-SCENE		
	AR400239				COORDINATOR'S		
					REPORT (OSC)		
AETC-1228	AR100036-		8/22/1985	Report	PRELIMINARY		
	AR100172				ASSESSMENT		
AETC-1229	AR314845-		11/00/168	Report	RECORD OF		
	AR314952				DECISION (ROD)		
AETC-1230	AR310702-		1/31/1997	Report	REMEDIAL		
	AR310887				INVESTIGATION (RI)		
					REPORT VOLUME I -		
					PART 1 OF 3 (1)1		
AETC-1231	AR311088-		1/29/1997	Report	REMEDIAL		
	AR311254			•	INVESTIGATION (RI)		
					REPORT VOLUME I-		
					REMEDIAL I (1)1		
AETC-1232	AR310889-		1/29/1997	Report	REMEDIAL		
	AR311087				INVESTIGATION (RI)		
					REPORT VOLUME I		
					REMEDIAL		
					INVESTIGATION		
					Section 3 -Physical		
					Features of Study Area		
AETC-1234	AR314510-		01/00/1998	Report	PROPOSED		
	AR314532				REMEDIAL ACTION PI AN (PRAP)		200
AETC-1237	No Bates		6/20/1995	Deposition	Deposition of Marvin		
	Numbers			Tran:	Jonas vol. 1		
AETC-1241	No Bates		0000/00/00	Exhibit	Deposition Exhibit P-68		
	Numbers						ige
AETC-1252	BSA1032908		0000/00/00	Exhibit	Deposition Exhibit P-41		
AETC-1253	BSAI030932		000/00/00	Exhibit	Deposition Exhibit P-42		9
AETC-1254	BSA1047236 -		0000/00/00	Exhibit	Deposition Exhibit P-27		of 6
A DTO 1052	0.4 P.T.0020		0000,00,00	T-1-12.52			
AEIC-1236	CAK 10029		0000/00/00	Exhibit	Deposition Exhibit Cherr		
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Author						Parky Calland	manufacture of the state of the				The books of									1	***************************************		
Summary	Deposition Exhibit Cheri	8	Deposition Exhibit P-10	Deposition Exhibit P-15	Deposition Exhibit P-18	Deposition Exhibit P-20	Deposition Exhibit P-22	Deposition Exhibit P-23	Deposition Exhibit P-24	Deposition Exhibit P-25	Deposition Exhibit P-26	Deposition Exhibit P-28	Deposition Exhibit P-34	Deposition Exhibit P-40	Deposition Exhibit P-5	Deposition Exhibit P-6	Deposition Exhibit P-7	Deposition Exhibit P-9	Deposition Exhibit D-17	Deposition Exhibit D-25	Deposition Exhibit D-26	Deposition Exhibit P-8	Deposition Exhibit P-11
Docdate	Exhibit		Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit
Docdate	0000/00/00		0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00	0000/00/00
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Batesrng	No Bates	Numbers	BSA1051931 - BSA1051923	VARIOUS	BSAJ035534	PHKS003410- PHKS003414	No Bates Numbers	No Bates Numbers	BSA1047230 - BSA1047234	PHKS003282 - PHKS003284	No Bates Numbers	PHKS003286 - PHKS003287	VARIOUS	BSA1032906	BSA1047227 - BSA1047229	BSA1000428 - BSA1000431	BSA1047242 - BSA1047244	BSA1029500 - BSA1029501	VARIOUS	NOV0038 - NOV0048	NOV0007	No Bates Numbers	BSA1051961 - BSA1051924
Trialx#	AETC-1258		AETC-1261	AETC-1263	AETC-1266	AETC-1269	AETC-1270	AETC-1271	AETC-1272	AETC-1273	AETC-1274	AETC-1275	AETC-1278	AETC-1280	AETC-1285	AETC-1286	AETC-1287	AETC-1288	AETC-1294	AETC-1297	AETC-1298	AETC-1300	AETC-1301

L L Health	Batesrng	Witness	Docdate	Docdate	Summary	Author	Recip	
AETC-1303	BH0003863		00/00/000	Exhibit	Deposition Exhibit P-50			С
AETC-1305	No Bates Numbers		0000/00/00	Exhibit	Deposition Exhibit P-65		17 - 18 - 18 - 18 - 18 - 18 - 18 - 18 -	ase
AETC-1317	ASHL00002- ASHL00004		0000/00/00	Exhibit	Deposition Exhibit Roetzer 1			2:02
AETC-1324	BSAI029271		0000/00/00	Exhibit	Deposition Exhibit Landmesser 4		1770	-cv-(
AETC-1336	BSA1050935		0000/00/00	Exhibit	Deposition Exhibit Leuzarder 9	4)383
AETC-1337	BSA1050965 - BSA1050966		0000/00/00	Exhibit	Deposition Exhibit Leuzarder 11	noti -	,	0-LE
AETC-1340	CART 0001 - CART 0004		6/12/1973	Exhibit	Deposition Exhibit Cheri		- Topography	D
AETC-1393	No Bates Numbers		00/00/00	Exhibit	Deposition Exhibit Jonas 26			Doo
AETC-1394	No Bates Numbers		6/20/1995	Exhibit	Deposition Exhibit Jonas			ume
AETC-1395	No Bates Numbers		12/19/1977	Exhibit	Deposition Exhibit Jonas 5	The second secon	7.07100	nt 3
AETC-1396	No Bates Numbers		4/19/1972	Exhibit	Deposition Exhibit Jonas 9		11 07 07 07 07	39
AETC-1401	No Bates Numbers		0000/00/00	Exhibit	Deposition Exhibit Jonas			File
AETC-1402	No Bates Numbers		0000/00/00	Exhibit	Deposition Exhibit Jonas			ed 0 :
AETC-1407	BSA1025204		11/8/2004	Exhibit	Deposition Exhibit Cheri			5/23/
AETC-1408	BSAI029156		1/25/1977	Exhibit	Deposition Exhibit Jenney 1			2008
AETC-1416	No Bates Numbers		0000/00/00	Exhibit	Deposition Exhibit Jonas		Topological	3 F
AETC-1417	No Bates Numbers		0000/00/00	Exhibit	Deposition Exhibit Jonas 20			age
AETC-1418	No Bates Numbers		0000/00/00	Exhibit	Deposition Exhibit Jonas 22			51 c
AETC-1419	No Bates Numbers		0000/00/00	Exhibit	Deposition Exhibit Jonas 23			of 65

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Summary	Deposition Exhibit Jonas	Deposition Exhibit Jonas	Societion Exhibit Ionas	28	Deposition Exhibit Jonas	position Exhibit Jonas	Deposition Exhibit Jonas	Deposition Exhibit Jonas	Deposition Exhibit Jonas 32	Deposition Exhibit Jonas	Deposition Exhibit Jonas 34	Deposition Exhibit Jonas 35	Deposition Exhibit Jonas 36	Deposition Exhibit Jonas 37	Deposition Exhibit Jonas	Deposition Exhibit Jonas 8	Deposition Exhibit Leuzarder 12	Deposition Exhibit Jonas 21	Deposition Exhibit D-4	Deposition Exhibit P-62
Docdate	Exhibit Del	Exhibit Del	Evhihit Der		Exhibit Del	Exhibit Dep	Exhibit Del	Exhibit Dep	Exhibit Del	Exhibit Dep	Exhibit Dep	Exhibit Dep	Exhibit Dep	Exhibit Dep	Exhibit Dep	Exhibit Dep	Exhibit Deg	Exhibit Dep	Exhibit Dep	Exhibit Dep
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Trialx#	AETC-1420	AETC-1421	AETC-1422		AETC-1423	AETC-1424	AETC-1425	AETC-1426	AETC-1427	AETC-1428	AETC-1429	AETC-1430	AETC-1431	AETC-1432	AETC-1433	AETC-1434	AETC-1437	AETC-1454	AETC-1455	AETC-1456

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Summary	Deposition Exhibit P-63	Deposition Exhibit P-69	Deposition Exhibit Cochran P-54	Deposition Exhibit Cochran P-56	Deposition of Marvin Jones Vol. 2	Deposition of Marvin Jonas vol. 5	Deposition of Marvin Jonas vol. 3	Deposition of Marvin Jonas vol. 4	SITE INSPECTION (SI)	Deposition Exhibit P-29	Deposition Exhibit Leuzarder P-46	Deposition Exhibit P-46	Deposition Exhibit Leuzarder P-47	Deposition Exhibit P-51	Deposition Exhibit P-43	Deposition Exhibit P-31	Deposition Exhibit P-32	Deposition Exhibit Chiras 4	Deposition Exhibit Jenney 2	Deposition Exhibit Chiras 1	Deposition Exhibit
Docdate	Exhibit	Exhibit	Exhibit	Exhibit	Deposition Tran	Deposition Tran	Deposition Tran	Deposition Tran	Report	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit	Exhibit
Docdate	0000/00/00	0000/00/00	0000/00/00	0000/00/00	6/21/1995	7/19/1995	6/22/1995	7/18/1995	1/20/1986	0000/00/00	0000/00/00	0000/00/00	0000/00/00	00/00/000	0000/00/00	00/00/00	00/00/00	1/25/1977	1/11/1977	1/11/1977	1/11/1977
Witness		April - April					And a second sec				ALCONO.										
Batesrng	No Bates Numbers	No Bates Numbers	No Bates Number	BSAI051679	No Bates Numbers	No Bates Numbers	No Bates Numbers	No Bates Numbers	AR100173- AR100256	BSA1019670- BSA1019671	BSA1022920	BSAI022920	BSA1022929 - BSA1022931	BSAI022973	BSA1024480	BSAI025180	BSAI025184	BSAI029156	BSAI029157	BSAI029157	BSA1029158
Trialx#	AETC-1458	AETC-1462	AETC-1467	AETC-1469	AETC-1473	AETC-1474	AETC-1475	AETC-1476	AETC-1479	AETC-1482	AETC-1486	AETC-1487	AETC-1488	AETC-1489	AETC-1491	AETC-1492	AETC-1494	AETC-1496	AETC-1497	AETC-1498	AETC-1499

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Trialx#	Batesrng	Witness	Docdate	Docdate	Summary	Author	Recip
AETC-1500	BSAI029158		1/11/1977	Exhibit	Deposition Exhibit Chiras 3		
AETC-1501	BSAI029191 - BSAI029293		0000/00/00	Exhibit	Deposition Exhibit Shampine 3		e 2.
AETC-1502	BSA1029211	Diaz Chemical Corp	0000/00/00	Exhibit	Deposition Exhibit Landmesser 6		100.00
AETC-1503	BSA1029212- BSA1029220		0000/00/00	Exhibit	Deposition Exhibit Shampine 2		
AETC-1513	No Bates Numbers		0000/00/00	Exhibit	Deposition Exhibit P-64		330-
AETC-1514	BSAI029195- BSAI029237	Diaz Chemica! Corp	00/00/1977	Invoice	AETC invoices to Diaz	Advanced Environmental Technology Corp.	Diaz Chemical
AETC-1525	BSA1029142	Diaz Chemical Corp	01/03/0000	Invoice	Invoice	Diaz Chemical Corp	Advanced Environmental Tech
AETC-1527	BSAI029143	Diaz Chemical Corp	1/11/1976	Invoice	Invoice	Advanced Environmental Technology Corp	Diaz Chemical Corp
AETC-1529	BSAI029154	Diaz Chemical Corp	01/00/1977	Bill of Lading	2,900 gallons waste sulfuric acid	Environmental Chemical Company	Diaz Chemical Corp
AETC-1530	BSAI029156- BSAI029160	Diaz Chemical Corp	1/25/1977	Invoice	AETC invoices to Diaz	Advanced Environmental Technology Corp.	Diaz Chemical
AETC-1531	BSA1029157- BSA1029158	Diaz Chemical Corp	7/11/11/1	Invoice	Bill of Lading	Fee.WA Diaz Chemical Corp	Advanced Sharing Shari
AETC-1532	BSAI029165	Diaz Chemical Corp	7/21/16/1	Invoice	Invoice	Advanced Environmental Technology Corp	Chemical Corp
AETC-1533	BSAI029172- BSAI029180	Diaz Chemical Corp	2/13/1977	Invoice	AETC invoices to Diaz	Advanced Environmental Technology Corp.	Diaz Chemical 6
AETC-1533	BSA1029190- BSA1029194	Diaz Chemical Corp	00/00/1977	Invoice	AETC invoices to Diaz f	Advanced Environmental Technology Corp.	Diaz Chemical

	Case	2:02-cv-03830-LDD	Document 339	Filed 05/23/2008	Page 55 of 65
Recip	Diaz Chemical				
Author	Advanced Environmental Technology Corp.				
Summary	AETC invoices to Diaz				
Docdate	Invoice	,			
Docdate	00/00/1977				
Witness	Corp				
Batesrng	BSA1029181- BSA1029189				

Trialx# AETC-1534 In addition, Plaintiffs specifically object to the following documents contained on the respective Defendants' exhibit lists on the basis that the documents may not be authentic.

However, Plaintiffs do not waive the right to assert that other documents contained on the Defendants' respective exhibit lists are also not authentic.

Ashland Chemical Company

- 48. October 26, 1976 list of chemicals transported by DeRewal Chemical Company.
- 61. Injunctive order issued by BCCP (No. 76-9647), 10/15/76
- 63. Photographs taken by Peter G. Noll of the Bucks County DOH (5/29/75, 2/26/75, 4/2/76 and 9/23/76)
- 69. PADER memo dated 3/12/73; handwritten note dated 3/12/73; photographs
- 70. 3/20/73 Photographs taken at Boarhead site.
- 71. 3/24/73 Photographs taken at Boarhead site.
- 72. 10/31/73 Waste Discharge Inspection Report, Memorandum from A. Wills to J. Daley (PADER), dated 11/1/73, handwritten file memo by P. Noll.
- 75. 1/23/74 Waste Discharge Inspection Report. Photographs taken at site.
- 77. 4/25/74 Waste Discharge Inspection Report; P.G. Noll sampling, photographs taken at site.
- 79. 2/26/75 Waste Discharge Inspection Report; handwritten file memorandum. Photographs taken at site.
- 80. 5/29/75 Waste Discharge Inspection Report. Photographs taken at site.
- 82. 7/15/75 Waste Discharge Inspection Report; handwritten notes. Photographs taken at site.
- 85. 4/2/76 Waste Discharge Inspection Report. Photographs taken at site.
- 86. 5/4/76 Photographs taken at Boarhead site
- 92. 9/8/76 Bridgeton Township Police Complaint/Inspection Report; photographs identified as B 76-871;
- 93. E. Hogg memorandum to file dated 9/10/76
- 95. newspaper article showing tanker; Water or Waste Quality Report).
- 96. 9/9/76 E. Hogg memorandum to file dated 9/10/76

- 97. Handwritten notes of P. Noll, dated 9/9/76).
- 98. 9/23/76 Waste Discharge Inspection Report, P. Noll memorandum and letter on sampling dated 11/1/76. Photographs taken at site.
- 100. 10/15/76 Agreed Injunction Order
- 101. 10/19/76 Waste Discharge Inspection Report; P.G. Noll Handwritten notes).
- 102. 10/26/76 List of chemicals transported by DeRewal Chemical Co. prepared, apparently by PennDot. (Typewritten and handwritten list received by BCDH on 10/26/76).
- 112. Intelligencer newspaper photo, September 1976
- 225. Pictures taken by EPA of drums found at Boarhead Farm containing waste and paper cups with the writing "Philo Ford" on the cups. (Exhibit-10 at Barsum's deposition). (BSAI034631)
- 338. Handwritten notes (possibly from DeRewal Chemical Co. files?), Bates #'d BH 0003959 and BSA1016578.
- 380. handwritten notes detailing DeRewal purchases and payments
- 381. 10/13/87 handwritten notes by Zia
- 426. Handwritten document from 1977 detailing hauling NRM waste acid;
- 429. Handwritten notes from 1976;
- 438. 1986 handwritten notes re CN;
- 439. 6/88 handwritten notes:
- 455. Handwritten notes (BSA1029302)
- 464. Handwritten notes (BSA1029302)

Handy & Harman Tube Company, Inc.

HH-89	Dept. of Health, 1971. Handwritten notes and waste inspection reports of Merit
	Metal. 1971-1972
HH-94	DeRewal Chemical Co., 1973b. Proposal to SPS for service, invoice from SPS
	to DeRewal, handwritten notes. 1972/1973. (BSAI016593-BSAI016595)
HH-115	DeRewal, M. 1973b, Letter from DeRewal to SPS, SPS Amendment to
	Purchase Order to DeRewal Chemical, handwritten notes, 1972/1973
HH-140	Handwritten Notes, 1988. Four pages of handwritten notes. November 6, 1988.
	(PHKS2143-PHKS2146)
HH-147	Meeting notes, 1988a. Handwritten Notes / DQO Removal Level. October 25,
	1988. (PHKS2154-PHKS2156)
HH-148	Meeting notes, 1988b. Handwritten Notes Re: Boarhead notes sampling plan.
	October 18, 1988. (PHKS2157-PHKS2160)
HH-149	Meeting notes, 1988c. Boarhead Sampling Notes. September 30, 1988.

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	(PHKS2163-PHKS2165)
HH-150	Meeting notes, 1988d. Meeting w/ Steve Javela / Potential removal candidates.
	August 15, 1988. (PHKS2166-PHKS2164)
HH-151	Meeting notes, 1988e. Meeting with the Bucks focus on residential sampling /
	handwritten notes. September 13, 1988. (PHKS2168-PHKS2175)
HH-152	Meeting Notes, 1988f. Meeting notes and attached documents. July 19, 1988.
	(PHKS2176-PHKS2177)
HH-153	Meeting Notes, 1996. Meeting notes Re: Boarhead Farms RI/FS. February 29,
	1996. PHKS1702-1703
HH-298	Handwritten Notes (possibly from DeRewal Chemical Co. files), Bates #'d
	BH0003959 and BSAI016578.

Carpenter Technology Corporation

11. Undated handwritten note with phone number of DeRewal and address of Sylvan Chemical Co.

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	Recip		Ashland Chemical Co	A. Curley	Dan Gurke Carpenter Technology					
	Author		State of New Jersey Environmental Protection Agency	File	USEPA	USEPA, Enforcement Division	USEPA, Enforcement Division	Carpenter Technology Corporation	Carpenter Technology Corporation	Carpenter Technology Corporation
	Summary	letters to and from EPA & AETC	possible attachment to Ashland's response to EPA	possible attachment to Ashland's response to EPA	Notes of telephone conversation with Dan Gurke re: extension of time for Carpenter to respond; Gurke states that he believes Carpenter Tech was not part of the	Telephone conversation record with Dan Gurkey, Carpenter Tech regarding request for extension of time to respond to 104(e) request	Telephone conversation record with Dan Gurke, Carpenter Technologies regarding request for information	Handwritten list of waste acids	Handwritten list of undissolved solids	Handwritten list regarding HCL
	Docdate	Handwritten note	Certificate of So????	Memorandum	Telephone Log	Telephone Log	Telephone Log	Handwritten Note	Handwritten Note	Handwritten Note
	Docdate	1/8/1995	9/17/1976	9/20/1976	12/7/1994	1/5/1996	11/15/1995	1/27/1971	00/00/000	0000/00/00
	Witness	Advanced Environmental Technology Corp.	Ashland	Ashland	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter
	Batesrng	AETC30- AETC35	BSA1023959	BSA1023961- BSA1023962	BSAI000469	BSA1000451	BSA1000468	CART0100	CART0102	CART0103
	Trialx#	AETC-0029	AETC-0417	AETC-0418	AETC-0455	AETC-0457	AETC-0458	AETC-0468	AETC-0469	AETC-0470

' I	Batesrng	Witness	Docdate	Docdate	Summary	Author	Recip
CAR	CART0130	Carpenter	09/00/1971	Handwritten	Handwritten notes	Carpenter	C
				Note	regarding acids	Technology Corporation	ase
CAI	CART0131	Carpenter	0000/00/00	Handwritten Note	Handwritten notes regarding acids	Carpenter Technology	2:02-0
CA	CART0133	Carpenter	0000/00/00	Handwritten Note	Handwritten notes regarding acids	Carpenter Technology	cy-038₹
<u>გ</u>	CART0134	Carpenter	0000/00/00	Handwritten Note	Handwritten notes regarding acids	Carpenter Technology	30-LDE
Š	CART0135	Carpenter	10/1/1971	Handwritten Note	Handwritten notes regarding acids	Carpenter Technology Corporation	Do Do
ζ <u>,</u>	CART0137	Carpenter	10/12/1971	Handwritten Note	Handwritten note regarding acids	Carpenter Technology Corporation	cumen
Č	CART0138	Carpenter	0000/00/00	Handwritten Note	Handwritten note regarding acids	Carpenter Technology Corporation	339
))	C018439	Carpenter	10/12/1971	Handwritten Note	Handwritten note regarding acids	Carpenter Technology Corporation	Filed
رد _′	CART0140	Carpenter	10/14/1971	Handwritten Note	Handwritten note regarding acids	Carpenter Technology Corporation	05/23
Ú	CART0141	Carpenter	10/18/1971	Handwritten Note	Handwritten note regarding acids	Carpenter Technology Corporation	2008
/O	CART0142	Carpenter	0000/00/00	Handwritten Note	Handwritten note regarding acids	Carpenter Technology Corporation	Pag
C)	CART0143	Carpenter	0000/00/00	Handwritten Note	Handwritten note regarding acids	Carpenter Technology Corporation	e 61 of
CA	CART0144	Carpenter	0000/00/00	Handwritten Note	Handwritten note regarding acids	Carpenter Technology Corporation	65

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Author	Carpenter	Technology Corporation	Carpenter Technology Corporation	Carpenter Technology Corporation	Carpenter Technology Comoration	Carpenter Technology Corporation	Carpenter Technology Corporation	Carpenter Technology Corporation.	Carpenter Technology Corporation.	Carpenter Technology Corporation	Carpenter Technology Corporation	Carpenter Technology Corporation	Carpenter Technology Corporation	Carpenter Technology Corporation
Summary	Handwritten note	regarding acids	Handwritten note regarding acids	Handwritten note regarding acids	Handwritten note regarding acids	Handwritten note regarding acids	Handwritten note regarding acids	Inventory regarding solid wastes produced	Inventory regarding solid wastes produced	Handwritten note regarding acids				
Docdate	Handwritten	Note	Handwritten Note	Handwritten Note	Handwritten Note	Handwritten Note	Handwritten Note	Inventory	Inventory	Handwritten note	Handwritten note	Handwritten note	Handwritten note	Handwritten note
Docdate	0000/00/00		11/3/1971	11/3/1971	12/1/1971	0000/00/00	0000/00/00	00/00/1978	00/00/1974	10/26/1971	11/2/1971	11/9/1971	11/30/1971	1/24/1972
Witness	Carpenter		Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter	Carpenter
Batesrng	CART0145		CART0147	CART0149	CART0150	CART0151	CART0152	CART0237 - CART0238	CART0239 - CART0248	CART0153	CART0154	CART0155	CART0156	CART0165- CART0171
Trialx#	AETC-0496		AETC-0497	AETC-0498	AETC-0499	AETC-0500	AETC-0501	AETC-0502	AETC-0503	AETC-0515	AETC-0516	AETC-0517	AETC-0518	AETC-0519

	Surcana	WILDESS	Docdate	Docdate	Summary	Author	Recip
AETC-0520	CART0172	Carpenter	4/21/1971	Handwritten	Handwritten note	Carpenter	
				note	regarding acids	Technology Corporation	ase
AETC-0521	CART0173	Carpenter	0000/00/00	Handwritten	Handwritten note	Carpenter	
				note	regarding acids	Technology Corporation)2-c
AETC-0522	CART0174	Carpenter	5/27/1971	Handwritten	Handwritten note	Carpenter	
				note	regarding acid waste	Technology	
					a description	Corporation	
AETC-0523	CART0176	Carpenter	0000/00/00	Handwritten	Handwritten note	Carpenter	
				note	regarding acids	Technology	
						Corporation	
AETC-0524	CART0179	Carpenter	7/6/1971	Handwritten	Handwritten note	Carpenter	D.
				note	regarding acids	Technology	
						Corporation	
AETC-0525	CART0181	Carpenter	1/61/51/9	Handwritten	Handwritten note	Carpenter	tur
			_	note	regarding acids	Technology	
						Corporation	
AETC-0528	CART0106	Carpenter	00/00/00	Handwritten	Handwritten list	Carpenter	
				note	regarding HCL	Technology	39
					and the state of t	Corporation	
AETC-0539	CART0182	Carpenter	00/00/00	Handwritten	Handwritten note	Carpenter	•
				note	regarding acids	Technology	-116
			İ			Corporation	
AETC-0642	BSA1000313	Flexible/Etched	0000/00/00	List	List		0
AETC-0650	BSAI082453	Flexible/Etched	10/17/1979	Personal Work	Notes	Flexible Circuits	
AETC-0651	FLEX00218	Flexible/Etched	0000/00/00	Chart/Graph	Notes	DeRewal Chemical	23/
						Co.	
AETC-0656	BSAI082453	Flexible/Etched	10/17/1979	Personal Work	Handwritten Notes	Flexible Circuits Inc	
AETC-0657	BSAI082490	Flexible/Etched	5/5/1982	Report/Study	Report	Flexible Circuits Inc	
AETC-0658	BSAI082511	Flexible/Etched	00/00/000	Drawing	Diagram	Udylite Corp	
AETC-0661	BSAI082602	Flexible/Etched	00/00/000	Personal Work	Notes	Flexible Circuits	
AETC-0668	BSA1082683	Flexible/Etched	1/25/1983	Drawing	Diagram	Flexible Circuits Inc	ge
AETC-0674	BSAI082573	Flexible/Etched	1/29/1971	Drawing	Diagram	Flexible Circuits Inc	б
AETC-0693	BSAI082626	Flexible/Etched	6/13/1972	Personal Work	Notes	Flexible Circuits	
AETC-0701	BSAI082770	Flexible/Etched	6/25/1992	Personal Work	Notes	Flexible Circuits Inc	DT (
AETC-0706	BSAI082469	Flexible/Etched	10/2/1980	Personal Work	Notes	Flexible Circuits	05

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Dated: May 23, 2008

Respectfully submitted,

Ballard Spahr Andrews & Ingersoll, LLP

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Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AGERE SYSTEMS, INC., CYTEC INDUSTRIES INC., FORD MOTOR COMPANY, SPS TECHNOLOGIES, LLC and TI GROUP AUTOMOTIVE SYSTEMS L.L.C.,

Civil Action No. 02-CV-3830 (LDD)

Plaintiffs,

ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION, et al.,

v.

Defendants.

CERTIFICATE OF SERVICE

DAWN M. NEUKIRCH, of full age, certifies as follows:

- I am employed by the law firm of Ballard Spahr Andrews & Ingersoll,
 LLP, as a legal secretary.
- 2. On this date, I caused one copy of Plaintiffs' Objections to Defendants'
 Trial Exhibits and Certificate of Service to be served via electronic submission upon the
 following:

ALL DEFENDANTS ON ATTACHED SERVICE LIST

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dawn M. Neukirch /s/

Dated: May 23, 2008